

## **PRIVACY POLICY**

LAST UPDATED: July 20, 2022

This Privacy Policy describes the manner in which “Sapanahai” and its affiliates, including without limitation, Sapanahai platform. (collectively, "Sapanahai", "we", "our", "us") use information in operating our business, our websites, digital platforms, our mobile and other software applications (each, an "app"), and any other online services that displays or provides an authorized link to this Privacy Policy (collectively, our "Services").

### **IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE OUR SERVICES.**

We reserve the right to update this Privacy Policy at any time to reflect changes in our privacy practices without prior notice to you. When the Privacy Policy is updated, we will update the date at the top of this page to indicate the date last updated, and the revised version will be effective as of the published effective date, and will be posted on each of the websites owned or controlled by “Sapanahai”. If we make what we regard to be significant changes to this Privacy Policy, we will provide appropriate notice to you.

Please check this Privacy Policy periodically for changes. Your continued use of our Services following the posting of changes to the Privacy Policy will mean you agree to be bound by such changes. We will also update the Privacy Policy and our privacy practices to comply with federal and provincial privacy legislation as they each may apply.

Your privacy is important to us. Although our ability to provide certain service requires that we collect Personal Information about our users, we take measures to ensure the privacy and confidentiality of that information. We are committed to undertaking reasonable measures to protect the privacy, accuracy, reliability and security of all of the Personal Information that is provided to us and to protect such information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Please read the following description of our policies and practices regarding your Personal Information.

### **1. Personal Information**

We will only use personally identifiable information about you in accordance with this Privacy Policy. Personally identifiable information is information about you that can be attributed to you, and may include but is not limited to, your name, mailing address, e-mail address, phone number, date of birth, payment information, age, gender, and/or user credentials, such as username, password, password hints and similar security information used to create an account and authenticate users of the Services and will be referred to as "Personal Information" in this Privacy Policy. We do not collect sensitive Personal Information, such as racial or ethnic origin or health or medical data through our Services. Personal Information does not include the name, title or business address or telephone number of an employee of an organization.

Our Services have various features and services. Many of these features and services are available to all visitors to our Services. Some features and services may only be available to those that have registered with our Services.

## 2. Collection, Use and Disclosure Practices

Wherever possible, we will identify the purposes for which Personal Information is collected at or before the time the Personal Information is collected.

We may use Personal Information for the purpose for which it was provided and for certain other activities, which are reasonably ancillary to such purpose. For example, if you send us an e-mail with a question or comment, we will use your e-mail address to respond to you. Further, we may store your e-mail and e-mail address and a copy of our response for future reference.

We may request Personal Information from you such as name, home address, telephone number, e-mail address, age, income, interests and gender for purposes such as newsletter,

chat room, contest and auction registration, and for participation in other interactive online activities as well as to enable us to market various goods and services to you.

We also may use Personal Information provided to us to better understand your needs and preferences; to provide to you information about our future events and other items that we believe you may be interested in, including the events of similar organizations; to recommend particular products and services; and to market various goods and services.

We may share information with current or future "affiliates", a term that includes our parent and subsidiary companies, joint venture partners, registered charities operated by us or other companies we control, are controlled by, or with which we are under common control.

If you have given us your express consent, from time to time we may share your Personal Information with other businesses, marketing partners and advertisers. We will only share such information with these third parties whose policies regarding Personal Information are consistent with our privacy policies and where we have your express consent to do so.

We have engaged agents and certain service providers to assist with our Services and activities (such as fulfillment companies). Further, we may work with other organizations similar to ourselves towards some common purpose consistent with our objectives. For these purposes, we may disclose your Personal Information to these agents, service providers and other organizations. However, we will require that these agents, service providers and other organizations agree that they will only use and disclose your Personal Information solely for those purposes, that they will not be permitted to use it for any other purpose and that they will adhere to the terms of this Privacy Policy.

If you have given us your express consent, we may also use your Personal Information to send you offers from our corporate marketing partners and other business partners. In addition, if you have given us your express consent, from time to time we may share your data with certain of these partners so that they may send you offers directly.

We may analyse Personal Information and other data in order to enhance our events and Services.

From time to time, we may place a "cookie" on your computer. Our third party service providers and ad servers may use cookies as well. A cookie is a file written to your computer's hard drive that can be used to track your Internet activity. Also, if you submit Personal Information to our Services (such as your name, interests or preferences), we may use cookies to keep track of such information so that you will not need to re-enter this information during subsequent visits. We may use cookies to customize delivery of our Services content and advertisements and for other internal site administration purposes. In addition, our ad servers, or those of our third party service providers, may use information about your visits to our Services to customize delivery of advertisements to our Services. You may elect not to have such information used by our ad servers for such purposes by making an e-mail request to that effect directed to [info@sapanhai.org](mailto:info@sapanhai.org) You may also set your Internet browser preferences to notify you when you receive a cookie or decline acceptance of cookies. However, if you decline acceptance of cookies you may experience less than optimal performance of our Services.

Our Services may also use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in India, and the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use the full functionality of this website.

We may also use and disclose Personal Information that is relevant to a legal proceeding or as permitted or required by law.

In the event we transfer control of any or all of our operations or services, we reserve the right to transfer and disclose your Personal Information to that party. However, we will require that party to agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose your Personal Information as we are similarly entitled under this Privacy Policy.

In the event we amalgamate with another organization, we reserve the right to permit that amalgamated organization to continue to use and disclose your Personal Information. However, we will require that the amalgamated organization agree that it will be similarly bound by the provisions of this Privacy Policy and that it will only use and disclose your Personal Information as we are similarly entitled under this Privacy Policy.

Some web browsers may transmit "do not track" signals to the websites and other online services with which the browser communicates. There is no standard that governs what, if anything, websites and online services should

do when such signals are received. We do not currently take action in response to these signals. If a standard for responding is established, we will update the Privacy Policy on responding to these signals.

Please note that this Privacy Policy is not intended to limit our ability to share or disclose aggregated, pseudonymized or anonymized data.

### 3. Consent for Collection, Use or Disclosure

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage third party service providers. By using our Services, you consent to the transfer of information to countries outside your country of residence, which may have different data protection rules than in your country. While such information is outside of India, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. However, our practices regarding your Personal Information will at all times continue to be governed by this Privacy Policy. If you have any questions about our relationship with these companies or the effect of this on your Personal Information please do not hesitate to contact our Privacy Officer at [info@sapanahai.org](mailto:info@sapanahai.org)

When you voluntarily provide us with your Personal Information, we assume you consent to its collection, use and disclosure in accordance with this Privacy Policy, subject to any collection, use and disclosure from which you have opted out. In some circumstances, we may expressly request your consent to certain collection, use or disclosure of your Personal Information or provide you with an opportunity to opt out of such practices. In some limited circumstances where authorized or required by law, we may collect, use or disclose your Personal Information without your consent. If you provide Personal Information about another person to us, you must make sure that you have the consent of that individual to enable us to collect, use and disclose their information as described in this Privacy Policy and by providing it to us, you represent and warrant that you have such consent.

We respect the right of each person to control how his or her Personal Information is used. If, for example you do not want us to collect your Personal Information, you may, in some circumstances be able to opt out at the time the Personal Information is collected. If, for example you do not want us to provide your Personal Information to our affiliates, or if you do not wish to receive marketing communications from us, you may, in some circumstances not provide your consent for such activities at the time the Personal Information is collected. Understand that you can also withdraw your consent at a later date, unless legal requirements prevent this or give us particular directions regarding your Personal Information. To do so, contact us at [info@sapanahai.org](mailto:info@sapanahai.org)

You may make the following choices regarding your Personal Information:

- Unsubscribe. You may opt-out of receiving future promotional email communications from us by clicking the "Unsubscribe" link in the footer of the promotional email communication and updating your

preferences. Additionally, you may identify specific email publications about our Services which you would like to receive by our websites. Please note that we may continue to send you transactional or service-related emails regarding your account.

- Location Information. If you use location-enabled services or applications covered by this Privacy Policy, you may be provided with an opportunity to opt out of having your location information collected and/or used for certain purposes. However, if you exercise such an opt-out option you may not be able to enjoy all of the functionalities offered by those services or applications. You also may be able to limit the collection of your location information through the settings on your device.
- SMS and MMS. You may opt out of receiving promotional SMS and MMS messages (e.g., text messages) from us by replying "STOP" to any message, which is free of charge. Please note that we may respond to your opt-out request with a message confirming that you have successfully opted out.
- Permanently Delete Information. You may request to have your Personal Information personally deleted at any time, under certain conditions. To exercise this option, please contact [info@sapanahai.org](mailto:info@sapanahai.org)

#### 4. Limiting Collection

We will limit the collection of Personal Information to that which is necessary for the purposes identified by us and pursuant to this Privacy Policy.

Our Services may automatically collect information when you visit them, such as which pages you visit, as well as your IP address, domain name, other device or network information, or location information. We may use this information for our internal business purposes, for example to tailor content on our Services or to assess the amount of traffic to our Services. We may also provide this information on an aggregated, anonymous basis to our marketing partners and/or advertisers.

#### 5. Limiting Use, Disclosure and Retention

We will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual to whom the Personal Information relates in accordance with this Privacy Policy or as required or permitted by law. We will retain Personal Information only as long as necessary for the fulfilment of the purposes for which it was collected or as required by law.

Without limiting the generality of the foregoing, except as otherwise provided in this Privacy Policy, we will not sell, rent, loan, trade, lease or otherwise transfer any Personal Information, including e-mail addresses, to any third party and we will treat any Personal Information you provide as confidential information.

#### 6. Security Safeguards

Only authorized employees and agents of ours who need access to your Personal Information in the course of their duties will have access to the information. We have security measures in place against unauthorized access, use, disclosure, alteration, loss or destruction of Personal Information under our control. These measures may include technological, physical and organizational methods of security. However, due to the nature of the Internet and the limits of technology we cannot guarantee that these security measures will not be breached in all circumstances. In the event of a security breach, we will comply with all applicable laws to notify you about the breach so that you can take protective steps.

Our Services which collect payment information online use industry-standard encryption technology to protect the security of your credit-card information.

## 7. Access to your Personal Information

Upon request, you have the right to confirm whether or not we maintain or control any Personal Information relating to you and whether such Personal Information has been used or disclosed by us. You also have the right, upon request, to access such Personal Information and to request correction of any erroneous or out-of-date Personal Information about you. In some limited circumstances as prescribed by law, we may not be able to grant you access to your information.

We pledge to investigate any complaint you may have regarding our use of Personal Information and to comply fully with the legal or regulatory supervisory authorities responsible for enforcing our adherence to the privacy principles stated above.

## 8. Children's Privacy Statement (Users Under 13 Years Old)

We take our responsibilities to our younger visitors seriously. In addition to the steps we take to safeguard the privacy and integrity of Personal Information submitted by adults, we adhere to the following principles and practices regarding Personal Information of children under 13 years old.

In general, we do not knowingly collect Personal Information from children under 13 via our Services, and we use age screening mechanisms to help prevent children from posting data on our Services, such as in our fan chat rooms (when available). We do not require children to register or to otherwise disclose Personal Information to participate in the activities in any youth-focused section of our Services.

From time to time, we may offer children the opportunity to enter youth-oriented promotions or contests via our Services. In this case, the child will be asked only to provide his or her first name and email address, as well as his or her parent's name and email address. We will use the information only to notify the contest winners, and will require that the winner's parent provide us with whatever information is needed to provide the prize.

We may also post information on our Services about other promotions or contests that are open to children but that require other personal information to enter. For these promotions and contests, children will be required to print a paper entry form from our Services and have their parents sign and mail or

fax the form to us. Children are not permitted to provide personal information via our Services in respect of these promotions or to enter these contests online.

If you have any comments or questions about the information you or your children have submitted on our Services, including its accuracy, integrity, or completeness, or if you wish to access, review, verify, correct, amend, or remove such information, you may send an e-mail to [info@sapanahai.org](mailto:info@sapanahai.org) Or, if you have any questions or comments about our use of your or your children's Personal Information or about our commitment to protecting your and your children's privacy, please contact [info@sapanahai.org](mailto:info@sapanahai.org)

## 9. Third Party Links

Please note that our Services contain links to other sites that are not operated by the us. We are not responsible for the privacy practices or the content of such sites, and we recommend that you view the privacy policy posted on each site and that you confirm that the site's policies are acceptable to you.

## 10. General

Nothing contained in this Privacy Policy is intended to create a contract or agreement between us and any user visiting our Services or providing Personal Information in any form.

This Privacy Policy shall be governed by and construed in accordance with the laws of India applicable therein, without reference to their conflicts of laws. If any provision of this Privacy Policy is held to be invalid or unenforceable, such provision shall be severed from this Privacy Policy and the remaining provisions shall remain in full force and effect. Headings are for reference purposes only and shall not be used in the interpretation of this Privacy Policy.

## 11. Contact Us

If you have any comments or questions about our privacy or security practices or about your Personal Information in our control, including its accuracy or integrity, or if you wish to change your preferences as to how we use and disclose your Personal Information, please send an e-mail to [info@sapanahai.org](mailto:info@sapanahai.org)