

PRIVACY POLICY

Last Updated on July 19, 2021

1. GENERAL

- 1.1. We (*defined below*) are committed to protect your privacy and grant importance to the confidentiality of your data over the internet. This privacy policy (“**Privacy Policy**”) read with the Terms and Conditions available at our websites <https://simsim.in>, <https://col.simsim.in/> and <https://seller.simsim.in> and our mobile applications (“**Platform**”) applies to all services offered to persons using or visiting (“**User(s)**”, “**You**” or “**Your**”) the Platform.
- 1.2. The terms “**Company**”, “**we**”, “**us**”, “**our**” shall mean **SZS TECH PRIVATE LIMITED**, a company duly incorporated under the provisions of Companies Act, 2013, having its registered office at A 4/3, Street No. 4, Vasant Vihar, South West Delhi, New Delhi - 110057, we believe it is important for You to understand what information we collect from You, how it is used and who will have access to the information collected by us. This Privacy Policy sets forth the policy in relation to the collection and usage of Personal Information (*defined hereinafter*) and User Data (*defined hereinafter*) that You may provide to us while using our Platform and related services (collectively “**Services**”).
- 1.3. By visiting or using our Platform, domain name and any other linked pages, features, content, or any other services we offer from time to time in connection therewith, or by using the Services in any manner, You acknowledge that You accept the practices and policies outlined in this Privacy Policy, and You hereby consent to our collection, use and disclosure of Personal Information in accordance with this Privacy Policy. If You are not agreeable to this, please do not use this Platform and/or Services provided by us.
- 1.4. Our Service does not address anyone under the age of 18 (eighteen) (“**Children**”). We do not knowingly collect personally identifiable information from anyone under the age of 18 (eighteen). If you are a parent or guardian and you are aware that your Child has provided us with personal data, please contact us. If we become aware that we have collected personal data from Children, we take reasonable steps to remove that information from our servers.
- 1.5. We collect, use, share, disclose and protect Your personal data provided while using the Services available on the Platform. The data collected is used only to enhance the operation of the Platform, allowing You to use all the listed features and allowing us to respond to Your requests/queries in an efficient manner. The Personal Information is used strictly in line with our business purposes and to provide You with useful features.

- 1.6. In this Privacy Policy, “*Personal Information*” shall mean information through which a User can be identified, directly or indirectly, in particular by reference to User, their name, email address, phone number, username, password, billing address, Internet Protocol (“**IP**”) address as well as any information associated with the foregoing (“**Personal Information**”). Personal Information does not include anonymized information that has been appropriately processed to make it non-identifiable in order to irreversibly prevent it’s identification.
- 1.7. We respect the privacy of our Users and are committed to protect it in all respects. The information about the User is collected by us is: (i) information supplied by Users; (ii) information automatically tracked during User's navigation on the Platform; and/ or (iii) communicated directly to us via e-mail or telephone or another channel/ mode.
- 1.8. User acknowledges that this Privacy Policy, together with Terms and Conditions, forms our agreement with the User in relation to his/ her use of the Platform. Any capitalized term used but not defined in this Privacy Policy shall have the meaning attributed to it in our Terms and Conditions.
- 1.9. For any service that the User may use, we only collect the data that is strictly necessary: (i) for the delivery of the Services, (ii) for the performance of a contract to which User is a party, (iii) for which User has given consent for such processing of data, or (iv) for compliance with a legal obligation to which we are subject.
- 1.10. By using the Platform or by otherwise giving us Your Personal Information, You will be deemed to have read, understood and agreed to the practices and policies outlined in this Privacy Policy and agree to be bound by the Privacy Policy. You hereby agree to our collection, use, sharing and disclosure (to the extent necessary for the purposes stated herein) of Your Personal Information as described in this Privacy Policy.

2. COLLECTION OF INFORMATION

- 2.1. In the course of providing Services to You through the Platform, we may collect the following:
 - 2.1.1. Personal Information such as Your name, phone number, username, password, e-mail address when You register on the Platform. When You visit or leave our Services, we may receive the URL of both the websites You came from and the one You go to next. This type of information is primarily used to maintain security, operation of our Platform and is also used for our internal analytics and reporting purposes.
 - 2.1.2. Information provided by You on Your e-mail/social media accounts which will be linked with the account created by You on our Platform, information disclosed therein including but not limited to username as provided by You at the time of sign-up and any other

information that may be required or be related to rendering the Services in an efficient and timely manner.

- 2.1.3. With Your permission, we may automatically collect some information about Your hardware devices when You access the Platform. For example, when You utilize our Platform, we may collect Your IP address and the type of mobile device/computer/laptop You use and Your geographic location. We may also collect information about Your activity on the Platform, such as information about Your account usage, as well as information about how You interact with the Platform (collectively, “**User Data**”). We may combine this automatically gathered information with other information, including Personal Information we have collected about You.
 - 2.1.4. If You permit cookies on Your browser, we may receive, and store certain types of information known as “Cookies” (*as defined herein below*) when You access the Platform. You can manage browser cookies through your browser settings. The “Help” feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to block cookies, and when cookies will expire. If you block all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some features and services may not work. For more information on how we use Cookies, please see Paragraph 6 below.
 - 2.1.5. All communications between You and the Company.
- 2.2. The information collected from You by the Company may constitute ‘*Personal Information*’ or ‘*Sensitive Personal Data or Information*’ as defined under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (“**SPDI Rules**”). The “*Sensitive Personal Data or Information*” (as defined by the SPDI Rules) of a person that we may collect and use consists of:
 - 2.2.1. financial information such as bank accounts, credit and debit card details or other payment instrument details; and
 - 2.2.2. any of the information received under or relating to the above clause by us for processing or storing under lawful contract or otherwise.
- 2.3. Through your acceptance of this Privacy Policy, You hereby consent to our collection and use of Your Personal Information in the manner stated herein. You further agree that your Sensitive Personal Data or Information may be collected and used in accordance with this Privacy Policy with your explicit (opt-in) consent.

- 2.4. Company will be free to use, collect and disclose information that is freely available in the public domain without Your consent to the extent permissible under applicable law.
- 2.5. In order to provide Services through the Platform, we may require the User to provide us with certain information that the User personally identifies him or herself with. Personal Information includes the following categories of information:
 - 2.5.1. Contact data (such as email address and phone number); and
 - 2.5.2. Demographic data (such as time zone, postal address and location details);
 - 2.5.3. If the User communicates with us, for example, via e-mail, registers with us, any information provided in such communication may be collected by us; and
 - 2.5.4. Financial data (such as account details, e-wallet details, bank account or credit or debit card details or other payment instrument details etc.) that User provides to us while using the Services provided by the Platform.
- 2.6. Our Platform may contain links to third party websites or applications. The User agrees and understands that privacy policies of these websites are not under our control and the User understands that once he or she leaves our servers, use of any information provided by the User shall be governed by the privacy policy of the operator of the website used by them.
- 2.7. We may disclose any information we may deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request, in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any personal or as otherwise required by law. Such transfer or disclosure shall be for lawful purposes only. Further, such transfer or disclosure of Your Sensitive Personal Information to other third parties shall only be done once it is ensured that the third party receiving such information has implemented the equivalent or greater level of security practices as we have, and any such transfer or disclosure shall only be for the purposes discussed in this Privacy Policy.
- 2.8. We take Your right to privacy very seriously and other than as specifically stated in this Privacy Policy, will only disclose Your Personal Information in the event it is required to do so by applicable law, rule, regulation, law enforcement agency, governmental official, legal authority or similar requirements or when Company, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms and Conditions.

3. PURPOSE OF COLLECTING PERSONAL INFORMATION

- 3.1. The Personal Information shared with the Company shall be primarily processed in India and such other jurisdictions where a third-party is engaged by the Company which may process the data. By agreeing to this Privacy Policy, You are providing the Company with Your explicit consent to process Your Personal Information, including Sensitive Personal Data or Information, for the purpose(s) defined in this Privacy Policy.
- 3.2. While rendering the services, we may use Your Personal Information (including Sensitive Personal Data or Information) and User Data including, payment details which include cardholder name, credit/debit card number (in encrypted form) with expiration date, banking details, wallet details etc. as shared and allowed to be stored by You.
- 3.3. We (and third-party data processors, merchants and logistics partners who may be acting on our behalf) may collect, store and process Your Personal Information (including Sensitive Personal Data or Information) and User Data for the following reasons:
 - 3.3.1. In order to confirm any order placed with respective service providers/vendors;
 - 3.3.2. keep You informed of the transaction status;
 - 3.3.3. send order confirmations either via Email, SMS or WhatsApp or any other messaging service;
 - 3.3.4. send any updates or changes to Your order(s);
 - 3.3.5. allow our customer service to contact You, if necessary;
 - 3.3.6. send verification message(s) or email(s);
 - 3.3.7. validate/authenticate Your account and to prevent any misuse or abuse;
 - 3.3.8. periodic marketing emails, text messages, push notifications, newsletters and exclusive promotions offering special deals.
 - 3.3.9. to make this Platform customized; to provide content tailored to individual requirements; to understand Your needs and provide You with improved products and Services, newsletters and other communications and to enable others to view any content created by You being the community opinion leaders;
 - 3.3.10. to maintain any registered accounts that You may hold with us and to provide You with updates or notifications of changes to Your account;

- 3.3.11. for our internal record keeping requirements including collection of anonymized details about visitors to our Platform to compile aggregate statistics or produce internal reports;
 - 3.3.12. for any purposes related to the above or where we have a legal right or duty to use or disclose Your Personal Information (including but not limited for abuse, crime and fraud prevention and related purposes);
 - 3.3.13. to better understand how the Users access and use our Services, both on an aggregated and individualized basis; and
 - 3.3.14. to provide various referral services and for sharing promotional and other benefits to our Users from time-to-time basis their transaction history with us.
- 3.4. Your User Data may be disclosed as part of any merger, sale of company assets or acquisition, as well as in the event of insolvency, bankruptcy or receivership, in which Personal Information would be transferred as one of the business assets of the Company.
 - 3.5. Further, in an ongoing effort to better understand and serve the Users of our Service, we also often conduct research on the customer demographics, interests and behavior based on the Personal Information and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregate data with our affiliates, agents, advertisers, and business partners. This aggregate information does not identify You personally. We may also disclose aggregated User statistics in order to describe our Services to current and prospective business partners and to other third parties for other lawful purposes (including providing advertising use cases to actual or potential advertisers).

4. SHARING OF PERSONAL INFORMATION

- 4.1. Your Personal Information shall be shared with the approved merchants, logistics partners and payment partners (“**Service Providers**”). You may note that while placing any order or availing any other Service from the Platform, You authorize us to share Your Personal Information with the said Service Providers. It is pertinent to note that the Company does not authorize the Service Provider to use Your information for any other purpose(s) except as may be for fulfilling their part of Service.
- 4.2. We may also share your Sensitive Personal Data or Information with Service Providers, in case necessary to fulfill the purposes specified in this Privacy Policy. We only share your Sensitive

Personal Data or Information with Service Providers that ensure equivalent or greater level of data protection as mandated under applicable law.

- 4.3. Through your acceptance of this Privacy Policy, You hereby consent to the transfer of your Personal Information in the above mentioned manner.
- 4.4. The app does use third party services that may collect information used to identify you.
- 4.5. The Company does not sell or rent individual customer names or other Personal Information of Users to third parties except sharing of such information with our business / alliance partners or Service Providers who are engaged by us for providing various referral services and for sharing promotional and other benefits to our Users from time-to-time basis their transaction history with us.
- 4.6. In the interests of improving personalization and service efficiency, we may, under controlled and secure circumstances, share Your Personal Information with our affiliate or associate entities or Service Providers. This will enable us to provide You with information about various products and services, or help us address Your questions and requests in relation to Your orders.
- 4.7. If the assets of the Company are acquired, our customer information may also be transferred to the acquirer depending upon the nature of such acquisition. In addition, as part of business expansion/development/restructuring or for any other reason whatsoever, if we decide to sell/transfer/assign our business, any part thereof, any of our subsidiaries or any business units, then as part of such restructuring exercise customer information including the Personal Information collected herein shall be transferred accordingly.
- 4.8. We use non-identifiable Personal Information of Users in aggregate or anonymized form to build higher quality, more useful online services by performing statistical analysis of the collective characteristics and behavior of our customers, and by measuring demographics and interests regarding specific areas of the Platform. Any Personal Information which we collect and use in an aggregated format is our property.

5. TENURE OF STORING YOUR PERSONAL INFORMATION

- 5.1. The Company will retain Your Personal Information and User Data on its servers for as long as is reasonably necessary for the purposes listed in this Privacy Policy. In some circumstances, we may retain Your data for longer periods of time, for instance where we are required to do so in accordance with any legal, regulatory, tax or accounting requirements.
- 5.2. Where Your personal data is no longer required, we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the Company.

- 5.3. Any Sensitive Personal Data or Information collected from You shall be securely deleted, within a reasonable period of time, when no longer required to be retained for the purposes for which it was collected, as stated in this Privacy Policy, or to comply with legal, regulatory, tax or accounting requirements.

6. USAGE OF COOKIES

- 6.1. A “cookie” is a small piece of information stored by a web server on a web browser so 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.
- 6.2. In some instances, we and our Service Providers use cookies and other technologies to automatically collect certain types of information when You visit our Platform, as well as through emails that we may exchange. The collection of this information allows us to customize Your online experience, improve the performance, usability and effectiveness of our online presence, and to measure effectiveness of our marketing strategies.
- 6.3. Further, You may encounter cookies or other similar devices on certain pages of the website that are placed by approved third parties. We also allow specific partners to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies.

7. SECURITY

- 7.1. The security of Your Personal Information and User Data is important to us. We follow generally accepted industry standards to protect the User Data and Personal Information submitted to us, both during transmission and once we receive it. Such information may also be converted to physical form from time to time, if deemed necessary. We take all necessary precautions to protect Your Personal Information both online and off-line and implement reasonable security practices and measures including certain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of our business.
- 7.2. Although we make best possible efforts to store Personal Information in a secure operating environment that is not open to the public, User must understand that there is no such thing as complete security, and we do not guarantee that there will be no unintended disclosures of Personal Information. If we become aware that User’s Personal Information has been disclosed in a manner not in accordance with this Privacy Policy, we will use reasonable efforts to notify such User of the nature and extent of such disclosure as soon as reasonably possible and as permitted by law.

- 7.3. Further, to ensure the safety of your information, we also recommend that You take all necessary steps within your control and follow best practices, such as:
- 7.3.1. if using a computer in a public location, always log out and close the website browser when You complete Your online session;
 - 7.3.2. keep Your account details and passwords private;
 - 7.3.3. frequently change Your password;
 - 7.3.4. avoid using the same password for multiple online accounts.
- 7.4. Depending on the processing of Personal Information, the data may be subject to a different storage period.
- 7.5. All information is stored or used for processing Services and under no circumstances are any of these details made available in the public domain. However, we may use this information to share with You additional and/ or upcoming information regarding the Services offered by the Platform.
- 7.6. The Platform may transmit User Data to the data servers, to ensure the security of data storage collected by us. The Personal Information is deleted once User requests for deletion of his account exclusively made on the Platform, except to the extent it is necessary to store the same under applicable laws. Further, we have implemented commercially reasonable physical, managerial, operational and technical security measures to protect the loss, misuse and alteration and to preserve the security of the Personal Information in our care.

8. REVIEW AND OPT-OUT

- 8.1. You may review the Personal Information and Sensitive Personal Data or Information you have provided to us by contacting at care@simsim.in and may correct or amend any deficient or inaccurate Personal Information or Sensitive Personal Data or Information by contacting our care@simsim.in.
- 8.2. You may withdraw Your consent to submit any or all Personal Information or decline to provide any permissions on the Platform as covered above at any time. In case, You choose to do so then Your access to the Platform may be limited, or we might not be able to provide the Services to You. You may withdraw Your consent by sending an email to our care@simsim.in. You can edit Your Personal Information by logging into Your account on the Platform.

9. CHANGE TO PRIVACY POLICY

- 9.1. The Company may update this Privacy Policy at any time, with or without advance notice. In the event there are significant changes in the way Company treats User's Personal Information, or in

the Privacy Policy itself, Company will notify you through either email, sms or a push notification depending on the information provided by you, so that You may review the changed terms prior to continuing to use the Services.

- 9.2. If You object to any of the changes to our Privacy Policy, and You no longer wish to avail the Services, You may contact at care@simsim.in to deactivate Your account and for any other issues related to this Privacy Policy. Unless stated otherwise, Company's current Privacy Policy applies to all information that the Company has about You and Your account.
- 9.3. If a User uses the Platform, after a notice of changes published on the Platform, such User hereby provides his/her/its consent to the changed terms.
- 9.4. This Privacy Policy is an electronic record in the form of an electronic contract formed under the Information Technology Act, 2000 and the rules made thereunder and the amended provisions pertaining to electronic documents/ records in various statutes as amended by the Information Technology Act, 2000. This Privacy Policy does not require any physical, electronic or digital signature and is a legally binding document between the User and the Company.

10. CONTACT US:

In case You have any queries pertaining to the Privacy Policy or our use of Your Personal Information, You can direct any questions or complaints to us by contacting the designated grievance officer in writing and the details are as follows:

Gaurav Jethani

GRIEVANCE OFFICER

GRIEVANCE.OFFICER@SIMSIM.IN

011-40747283

A 4/3, STREET NO. 4, VASANT VIHAR, SOUTH WEST DELHI, NEW DELHI - 110057

We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of Your Personal Information as soon as possible. We try to respond to all legitimate requests within 30 (thirty) days from the date of receipt of the complaint. Occasionally it may take us longer than the same if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.