

## PRIVACY POLICY

This Privacy Policy (the "**Policy**") sets out how KNET Solutions Private Ltd., handles or deals with your Personal Information including Sensitive Personal Data which KNET Solutions Private Ltd. collects, receives, possesses, stores, deals or handles while you use KNET Solutions Private Ltd.'s website, applications (hereinafter called as "apps") and services (collectively, "KNET Solutions Private Ltd. Products") or otherwise interact with us during the course of our relationship.

This Policy should be read with the Terms of Use at <https://www.cherrinet.in> Terms and Conditions of Customer Acquisition Form (**CAF**) for KNET Solutions Private Ltd. Services, End User Agreement of KNET Solutions Private Ltd. terms agreed or document executed / signed by you, as may apply.

Registration, usage or purchase of any of KNET Solutions Private Ltd. Products implies your express consent and agreement to this Policy.

This Policy may be modified in view of changes in business, technology, regulatory framework and the like. The modification will be intimated to you online. You are encouraged to regularly visit this page to review the policy and any modifications.

To facilitate your seamless access to KNET Solutions Private Ltd. Products, billing, innovation, improvement, marketing and promotion and / or for complying with regulatory obligations, KNET Solutions Private Ltd may collect the following types of information:

1. "Personal Information" i.e., information which either directly or indirectly, in combination with other information available or likely to be available with KNET Solutions Private Ltd. is capable of identifying you, which without limitation may include the following:
  - a. Basic details which you provide during the registration process such as your Name, father's Name, mother's Name, spouse's Name, Date of Birth, Phone Number, Email Address, Communication or Permanent Address.
  - b. Photograph provided during registration or during the profile update.

- c. Proof of Identity and Address such as Aadhar Card, PAN Card, Driving License, Passport etc.
- d. Transactions performed which can identify you as an individual through your customer ID or other relevant unique identifier.
- e. Demographic details such as gender, city, PIN code or nearest location.
- f. Usage logs/Server logs/Cookies which may contain details of your Personal or Sensitive Personal Information.
- g. Service specific information or identifiers such as Mobile Station International Subscriber Directory Number (MSISDN), Customer ID etc.
- h. Device specific information or identifiers such as OS specific identifiers.

**Note:** For this policy, Sensitive Personal Data or Information is treated as a part of Personal Information, which may without limitation include the following:

- i. Passwords or authentication information for any of KNET Solutions Private Ltd products.
  - j. Financial information, such as details of bank account, credit card, debit card, or other payment instrument details etc.
  - k. Biometric information
2. We are required under law to collect the following information, which is mandatory for provision of services to you:
- a. Basic details which you provide during the registration process such as Name, Phone Number, Communication or Permanent Address.
  - b. Photograph provided during registration.

- c. Proof of Identity Documents such as Aadhar Card, Pan Card, Driving License, Passport.
- d. Proof of Address Documents such as Driving License, Passport, Utility Bills.

In the CAF, we have clearly identified fields which are mandatory and those which are optional. In case you refuse to provide your information or deny consent for the usage of the information provided or later withdraw your consent, we may choose to discontinue or deny the services for which the information was collected.

3. **Non-Personal Information** which shall mean information that does not identify you or any other individual, and includes session, web sessions, internet usage, web beacons and usage and transaction data, aggregate log data and aggregate information. We may automatically collect information related to your use of KNET Solutions Private Ltd. Sites - for example, we collect your computer's or mobile device's operating system type and version, Internet Protocol (IP) address, Computer or mobile or any other device ID, Wi-Fi network name (SSID – service set identifier) and strength, access times, browser type and language, and the websites you visited, search results, content and advertisements you select and view and content settings and preferences, channels you add and view, including time and duration in the channels, and other usage statistics. When you download or use KNET Solutions Private Ltd. Apps or our Affiliates, we may receive information about your location and your mobile device, including a unique identifier for your device. We use this information to inter-alia deliver our web pages to you upon request, to tailor our services to the interests of our users, to measure traffic within our services, to improve the quality, to better understand

your needs, to remember your preferences, and to provide location based services, targeted advertising, functionality and interactivity and let advertisers know the geographic locations from where our users/visitors come. At any time while you are surfing KNET Solutions Private Ltd website, if you do not wish to share surfing information, you may opt out of receiving the cookies from our website by changing privacy setting in your browser.

## USE OF INFORMATION

1. The information provided by you to us is used for a number of purposes connected with our business operations which may include the following:

- a. Verify your identity, access, privileges assigned and relationship with us.
- b. Provisioning of products/services, testing or improvement of services, recommending various products or services;
- c. to understand how you and other users are using the KNET Solutions Private Ltd. Services and our other products and services in order to make them better;
- d. Processing your requests, enquiries and complaints, customer services and related activities;
- e. Communicating about KNET Solutions Private Ltd Products including invoices, confirmations, notices, updates, security alerts, support and administrative messages, existing or new offers, content, advertisements and promotional messages, user surveys, key policies or other administrative information;

- f. To respond to your complaints, service requests, comments and questions and provide customer service;
  - g. To provide periodic maintenance and support to the KNET Solutions Private Ltd services, including automatic software updates;
  - h. Analytics and reviews for improvement of our services;
  - i. To personalize your experience, suggest and offer you relevant content and display marketing and advertising tailored to your preferences on KNET Solutions Private Ltd Services, Third Party Channels, and other third party websites, apps, platforms and devices;
  - j. Improving your experience while using our services by presenting advertising, products and offers tailored to you;
  - k. for marketing purposes, including sending you emails and text messages about products, events, promotions and offers from KNET Solutions Private Ltd. or its partners or advertisers;
  - l. Completing your purchase / transaction;
  - m. to enforce our terms and conditions or protect our business, partners or users;
  - n. to protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity;
  - o. Compliance with law and directions of law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law or anti-fraud activities/systems; and
  - p. Other usages that you may consent to.
2. We will make best efforts to keep your personal information confidential and will place reasonable

security controls to protect it. Your Personal Information will be kept confidential as required under applicable laws.

3. KNET Solutions Private Ltd. may at its discretion engage Third Parties i.e., a Service Provider who associates with KNET Solutions Private Ltd. and is involved in handling, managing, storing, processing, protecting and transmitting information of KNET Solutions Private Ltd. and shall include all Sub-Contractors, Consultants and / or the representatives of such third party. Such third party though external to KNET Solutions Private Ltd. shall be subject to contractual commitment to adhere to KNET Solutions Private Ltd.'s guidelines as to management, treatment and secrecy of Personal Information.
4. Any comments, messages, blogs, scribbles etc. posted / uploaded / conveyed / communicated by you on the public sections of the apps/website becomes published content and is not considered personal information subject to this Policy. You may request that such information be taken down and, we may attempt to remove any such information if it is technically feasible to do so and as per the applicable laws.
5. We shall use Non-Personal Information automatically collected and stored by us to understand and analyse trends, to administer our services, to learn about user behaviour on the apps and while using our services, to gather demographic information about the user base as a whole and to measure traffic patterns on our network and apps. As Non-Personal Information does not personally identify you, we may use and disclose Non-Personal Information at our discretion.

## TRANSFER OF INFORMATION

KNET Solutions Private Ltd. may transfer your Personal Information or other information collected, stored, processed by it to any other entity located in India or outside only in case it is necessary for providing services to you or if you have consented (at the time of collection of the relevant information) to the same. In the event of such transfer same level of data protection as is adhered to by us, will be ensured.

## SHARING AND DISCLOSURE

We do not sell or rent personal information to any third party entities. We limit the disclosure of the Personal Information to certain circumstances, as provided below:

- a. Mergers or acquisitions: In a scenario where we or our assets are merged or acquired by the other business entity, or during restructuring of business or re-organization, we may have to share information provided by you with the other business entities. Rest assured, if such a transaction occurs the other business entity or the newly combined business entity would be required to follow this Privacy Policy.
- b. Partners: we engage a number of vendors, consultants, contractors and take support of our group companies or affiliates (hereon referred to as our Partners). Our Partners provide a host of services including contact information verification, payment processing, customer service and other similar services. These Partners play a key role in seamless delivery of our products and services to you. These Partners and their employees operate under a contract and strict security & confidentiality restrictions. We may provide our partners access to your information through our

systems or may share your Personal Information with them to enable them to provide their services to you.

- c. **Customer Initiated Sharing:** Whenever you request us to share your information with a third party website or application (for example, login to a third party using your KNET Solutions Private Ltd. Customer ID), we will provide a fresh notice and obtain consent from you regarding the details of the information that will be shared, before sharing the same. In such a case, KNET Solutions Private Ltd. will not be in control of the information (shared with the third party website/application or data generated based on your usage on that website/application) and KNET Solutions Private Ltd. privacy policy will not be applicable for any such use, access etc. Any processing, use, sharing of Information provided by you to such third party website/application shall be as per the respective privacy policy of such applications and websites. You shall read and provide consent to the third party's privacy policy before requesting KNET Solutions Private Ltd. to share the information.
- d. **Government or judicial process:** We may share your Personal Information with the government / government authorities or agencies and legal or judicial authorities for any investigation or to comply with legal process or in response to a request by any of these authorities or to enforce applicable terms and conditions or to protect our, our users and Partners rights, privacy, safety or property.
- e. **Legal Reasons:** The information provided by you may be shared with our other entities and affiliates to help in detecting and preventing identity theft, frauds and other illegal activities; correlate or map related accounts to prevent misuse of our products & services and to provide you our services.

- f. Protection of KNET Solutions Private Ltd. : To protect your rights and/or those of our Partners, and to allow KNET Solutions Private Ltd. to pursue available remedies or limit the damages that it may sustain in case of unauthorised use / misuse of our products or the content thereon, by third parties.

## STORAGE, RETENTION AND SECURITY

1. We have adopted reasonable security practices and procedures, in compliance with applicable policy, to include strategic, operational, managerial, technical, and physical security controls to safeguard and protect your data and information. We have implemented such measures, as stated above, to protect against unauthorized access to and unlawful interception of Personal Information. Additionally, we have adopted measures to ensure that your personal information is accessible to our employees or partners employees strictly on the need to know basis.

2. Our website, applications, portals, and network equipment have industry standard security precautions in place to protect the loss, misuse and alteration of information which is in our environment. Whenever you change or access your account information, we facilitate the use of secure systems. The information in our custody and control is protected by adherence to reasonable security procedures in order to safeguard against unauthorized access. We apply encryption or other appropriate security controls to protect Personal Information when stored or transmitted by us.

3. Your information or data will primarily be stored in physical form. However, certain data can also be stored in Electronic form.

4. We may enter into agreement with third parties to collect, store, process your information or data but under full compliance with applicable laws. These third parties may have their own security standards to safeguard your information or data and we will require such third parties to adopt reasonable security standards to safeguard your information / data on commercially reasonable basis.
5. We have taken appropriate steps for the security and protection of all our digital platforms including internal applications, however, we shall not be responsible for any breach of security or the disclosure of Personal Information for reasons outside our control, such as hacking, social engineering, cyber terrorism, espionage by third parties, or any events by way of force majeure such as sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government.

## **THIRD PARTY WEBSITES, APPLICATIONS AND SERVICES.**

KNET Solutions Private Ltd. Application/website may include links to other websites/applications. Such websites/application are governed by their respective privacy policies, which are beyond our control. Once you leave our servers, use of any information you provide may be governed by the privacy policy of the operator of the website/application you are visiting.

Whenever you request us to share your information with a third party website or application (for example, login to a third party using your KNET Solutions Private Ltd. Customer ID), we will provide a fresh notice and obtain consent from you regarding the details of the information that will be shared, before sharing the same. In such a case, KNET Solutions Private Ltd. will not be in control of the information (shared with the third party website/application or data generated based on your

usage on that website/application) and KNET Solutions Private Ltd privacy policy will not be applicable. The third party website/application will handle the information according to their own privacy policy. The customer shall read and provide consent to the third party's privacy policy before requesting KNET Solutions Private Ltd. to share the information.

## ACCESS, CORRECTION AND DELETION

We shall make all efforts to keep our records updated and accurate with your latest information. You shall be responsible to ensure that the information or data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consent to provide such information or data.

Based on technical feasibility, we will provide you with the access to all your personal and sensitive personal information that we maintain about you. We will perform verification before providing you access to this information.

You may request access, correction or updating, and deletion of the information by contacting KNET Solutions Private Ltd.

You may note that deletion of certain information or withdrawal of consent may lead to cancellation of your registration with us or your access to our services. Additionally, we may not be able to process your request of correction, updating or deletion, in case the same is not supported by valid documents or data retention if required by the applicable law or law enforcement requests or under any judicial proceedings or it is extremely difficult to implement (such as requests related to backup copies or if a new system is required to process the request or change of technical design) or risks the privacy of other users.

## FEEDBACK AND GRIEVANCE REDRESSAL

We are committed to safeguard your personal information collected and processed by us. In case of any feedback or concern regarding protection of your personal information, you can contact us at [support@cherrinet.in](mailto:support@cherrinet.in). If not resolved you may also direct your privacy-related feedback or concerns to the Privacy Grievance Officer whose details are as mentioned below:

Grievance Officer :

Name : Kannan. M

Contact Details :

Email : [appellateauthority@knet.co.in](mailto:appellateauthority@knet.co.in)

Working Days : Monday to Friday

Working Hours : 09:30 AM to 06:00 PM(excluding Public Holidays)

We shall strive to redress your concern expeditiously and effectively.