

RALLIS ANUBANDH – PRIVACY POLICY

Last Updated on: 04/02/2022

User privacy is of paramount importance to Rallis India Limited (“**Company**”). This “**Privacy Policy**” determines how the Company collects, uses, discloses, and stores User’s Personal Information (as *defined hereinbelow*) on the Rallis Anubandh mobile Application or App (as *defined hereinbelow*). Users are advised to familiarize themselves with this Privacy Policy.

Rallis Anubandh is a platform that allows the User to provide information on their sales performance, track and analyse the same through their User Account. Based on the performance of the User and participation in several schemes, the User shall be eligible for loyalty points and can redeem the points to avail benefits under such schemes.

This document is an electronic record in terms of Information Technology Act, 2000 and rules thereunder as applicable and the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures.

Privacy / confidentiality in relation to the User Content uploaded, disclosed or stored by the User on their User Account will be governed by the Terms and Conditions [www.zaggle.in/Rallis/TnC].

For the purpose of this Privacy Policy, wherever the context so requires, the term:

- (i) “**App**” shall mean the Rallis Anubandh mobile application as defined under the App’s Terms and Conditions [www.zaggle.in/Rallis/TnC]
- (ii) “**Applicable Law**” shall include all laws, statutes, ordinances, bills, regulations, guidelines, policies and other pronouncements having the effect of law of all or any applicable jurisdictions by state, municipality, court, tribunal, government, ministry, department, commission, arbitrator or board or such other body which has the force of law in all or any applicable jurisdiction.
- (iii) “**Content**” shall include, without limitation, data, text, written posts, comments, software, scripts, interactive features generated, graphics, images, photos, documents, audio, video, location data, nearby places and all other forms of information or data.
- (iv) “**Corporate User**” shall mean and include a non-individual User.
- (v) “**Grievance Officer**” shall have the meaning as ascribed to it under Clause 14.
- (vi) “**Person**” shall mean and be deemed to include any individual, firm, company or other corporate body, government authority, joint venture, association, partnership or other entity (whether or not having separate legal personality).
- (vii) “**Personal Information**” shall have the meaning ascribed to it in Clause 3.1 of this Privacy Policy.
- (viii) “**Services**” shall mean the services as detailed under Clause 3 of the App’s Terms and Conditions [www.zaggle.in/Rallis/TnC].
- (ix) “**Third Party Privacy Policies**” shall mean this Privacy Policy (as *amended, modified or restated from time to time*) read with policies of TSPs (as *defined hereinbelow*).
- (x) “**TSPs**” shall mean, third party service providers, as applicable, whose services are used in addition to or in conjunction with the Services of the Company.
- (xi) “**User**” shall mean either any individual or a natural person or a Corporate User or who accepts this Privacy Policy and the App’s Terms and Conditions [www.zaggle.in/Rallis/TnC] and who seeks to avail the Services of the Company and has registered/ created a User Account on the App. Nothing in this Privacy Policy shall be deemed to confer any third-party rights or benefits.

- (xii) "**User Account**" shall mean the account created by the User by providing the Company certain required User information and as defined under the Terms and Conditions.
- (xiii) "**User's Content**" shall mean any Content that the User saves, submits, posts, displays, uploads, shares, transmits, through or in their User Account.

1. Acceptance and Registration

- 1.1. This Privacy Policy will apply to the User for accessing and/ or browsing of the App and by registering, transacting, or otherwise using the App or Company's Services. User agrees that their Personal Information shall be handled in accordance with this Privacy Policy. Further, User also agrees to Company's terms for accessing and collecting information, including but not limited to Personal Information as described in this Privacy Policy.
- 1.2. User's use of the App and Services and any dispute over privacy, are governed by this Privacy Policy and App's Terms and Conditions [www.zaggle.in/Rallis/TnC], which shall be deemed to be incorporated into this Privacy Policy and shall be read in addition to this Privacy Policy.
- 1.3. In the event of any inconsistency or ambiguity arising between the Terms and Conditions [www.zaggle.in/Rallis/TnC] and the terms of this Privacy Policy, the provisions in this Privacy Policy to the extent of such inconsistency or ambiguity, shall prevail. Depending on User's interactions with Company, other terms may also be applicable to the User.
- 1.4. This Privacy Policy (*as amended, modified, or restated from time to time*) read with Third Party Privacy Policies shall be applicable to the User and constitute a binding arrangement between Company and the User.
- 1.5. By impliedly or expressly accepting this Privacy Policy, the User also agrees to have read and be bound by, and accepts:
 - 1.5.1. all of the Company's policies (including but not limited to App's Terms and Conditions [www.zaggle.in/Rallis/TnC], as amended from time to time);
 - 1.5.2. any disclaimers or other restrictions presented to User on the App; and
 - 1.5.3. any applicable Third Party Privacy Policies.
- 1.6. User acknowledges and agrees to the collection, retention and use of the information that the User discloses on the App in accordance with this Privacy Policy, including but not limited to User's consent for sharing User information as per this Privacy Policy.
- 1.7. User also acknowledges and agrees that with respect to certain activities, the collection, transfer, storage, and processing of User Personal Information that may be undertaken by trusted third party partners or affiliates or agents of Company such as credit card processors, web hosting providers, communication services, and web analytic providers, to help facilitate Company in providing certain functions.
- 1.8. Unless stated otherwise, this Privacy Policy applies to all information that the Company has about the User and User Account.

2. Eligibility

The App and/or the Services are not intended for use of any person under the age of 18. The Company does not knowingly collect any Personal Information from any person under the age of 18 or market to or solicit information from any person under the age of 18. If the Company becomes aware that a person submitting Personal Information is under the age of 18, the Company shall delete such User Account and any related information immediately. If any person believes that they may have any information from or about a person under the age of 18 using the App and/or Services, please contact the Company at Connect@rallis.com.

3. Collection and Use of Personal Information

3.1. The Company may collect and use, through the App, information that can be used to identify or contact a User (“**Personal Information**”), including but not limited to Personal Information as enumerated below:

3.1.1. Information Company Collects Directly from User:

When User interacts or transacts on the App, Company collects information from the User, including but not limited to Personal Information. The type of information that Company collects depends on the User’s interaction with Company via the App, but may include, where permitted by Applicable Laws, the following:

- Name and E-mail address (at the time of registration on the App);
- Contact number and contact preferences;
- Address and others;

3.1.2. Information Company Collects Automatically:

The Company automatically also collects certain information about a User’s use of the App through other technologies and sources for maintaining the security and operation of the App, to enhance the Services and for conducting internal analytical and reporting purposes of the Company. The same has been set out below:

- User’s device details;
- User’s browser type and operating system;
- Links the User clicks;
- User’s Internet Protocol (IP) address;
- The length of time User visits the App or uses the Services;
- User’s activities on the App or use of the Services (including User’s movement/navigation through the App).

3.2. Company may use and retain the information, including Personal Information, that the Company collects from the User in an aggregated form or Company may associate it with User’s username and other Personal Information that Company collects about the User. Company may also combine information collected about the User on the App with information collected through User’s use of Company’s Services for the same purposes as Company would use such information in non-combined form.

3.3. Company may use and retain such information, including Personal Information to send User any communication including but not limited to notifications related to the User Account, announcements about updates/ additions/ variations to the Services that Company may offer from time to time.

3.4. Company may occasionally hire third parties to provide limited services on its behalf, including answering User questions about Services and sending postal mail. Company will only provide such third parties the information they need to deliver the Service, and they are prohibited from using that information for any other purpose.

3.5. Company and TSPs may use Personal Information to verify credentials from third parties including social media platforms, financial institutions, identification verification agencies and credit reference agencies for providing the Services.

4. Sensitive Personal Information

4.1. “**Sensitive Personal Information**” refers to Personal Information revealing, relating or constituting religious or political beliefs or affiliation, financial data (*such as bank account/ credit card/ debit card/ billing/ payment/ password details*), genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s caste, tribe, transgender status, intersex status, sex life or sexual orientation.

4.2. The Company does not actively require/ collect/ processes Sensitive Personal Information of the User, however, Users may post or share such Content which may reveal Sensitive Personal Information. Any User who decides to post or share such Content revealing Sensitive Personal Information shall be considered to have consented to the collection and processing of such Sensitive Personal Information.

5. Manner of dealing with Personal Information

5.1. The Company uses the information that it gathers about User for the following purposes:

- 5.1.1. To provide the Company's Services to the User, to communicate with the User about User's use of Company's Services.
- 5.1.2. For any purpose for which the User has specifically provided the information to Company, including, to respond to User's inquiries and for providing customer service.
- 5.1.3. Use the User's information, such as the User's email address, phone number, or mailing address to contact the User with newsletters, marketing and promotional communications, to administer schemes.
- 5.1.4. To post User testimonials, request feedback, to contact the User about their use of the App, to manage User accounts' communications with the User's consent.
- 5.1.5. The Company gathers some information automatically and stores it in log files. The Company uses this information to understand and analyze trends, to administer the App, to gather demographic information about the Company's User base as a whole and also towards administering, monitoring and improving the App and Services. The Company may use this information for internal purposes, and for other research, audit and analytical purposes.
- 5.1.6. To provide Services requested by the User. The Company uses the User's Personal Information to resolve disputes; troubleshoot problems; help promote a safe service; measure consumer interest in Services, Services, and updates; customize User experience; detect and protect Company against error, fraud and other criminal activity; to enforce Company's Terms and Conditions [www.zaggle.in/Rallis/TnC]; to comply with legal and regulatory requirements and as otherwise described to the User at the time of collection.
- 5.1.7. The Company shall collect or obtain Personal Information only in a fair and lawful manner. Specifically, the Company shall:
 - i. Collect only as much information as is required by law or needed for the purposes about which the individual has been informed;
 - ii. Collect information in a fair and non-deceptive manner;
 - iii. Clearly indicate to individuals, which information is required and which is optional, at the time of collection; and
 - iv. Collect information directly from the individual, when possible.

- 5.2. Company will not, without User's express consent, share, sell, rent, trade or supply User's Personal Information to any third party for the purpose of their or any other third party's direct marketing/ promotional purposes.
- 5.3. Company may use, share and keep confidential Corporate User's Personal Information based on the terms set out under this Privacy Policy.

6. Disclosure of User's Personal Information

- 6.1. User's Personal Information will only be shared by Company to provide or improve the App and its Services subject to the terms and conditions of this Privacy Policy.
- 6.2. At times Company may make certain Personal Information of Users available to strategic partners or other professional organisations or to affiliated third parties (such as vendors, service providers, contractors or agents) that help the Company market to the Users. User's Personal Information will only be shared by the Company to provide or improve the App or its Services and advertising and will not be shared with third parties for their marketing purposes.

- 6.3. It may be necessary by Applicable Law, legal process, litigation, and/ or requests from public and government authorities for the Company to disclose User's Personal Information or User's "Non-Personal Information". The Company may also disclose information about the User if it determines that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. For the purposes of this Privacy Policy, "Non-Personal Information" shall mean the information other than Personal Information.
- 6.4. The Company may also disclose information about the Users, if it determines that disclosure is reasonably necessary to enforce the Company's Terms and Conditions [www.zaggle.in/Rallis/TnC] or protect its operations or Users or to protect the Company against third party claims.
- 6.5. In the event of a reorganization, merger, or sale the Company may transfer any or all Personal Information to the relevant third party with intimation to User.
- 6.6. The Company may disclose the information, the Company collects from the Users where the Company believes it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of the Company's Terms and Conditions [www.zaggle.in/Rallis/TnC] or this Privacy Policy, or as evidence in litigation in which the Company is involved.
- 6.7. The Company may disclose information to any Person, in the event the Company has sufficient reason to believe that such Person may by way of application to a court or any other competent governmental authority apply for disclosure of the User's information and such court or governmental authority, in the Company's reasonable opinion, is likely to order the disclosure of such User's information.

7. Review and Updating Personal Information

The Company provides Users with the means to ensure that their Personal Information is correct and current. Users may review and update this information and other details related to their profile at any time by contacting the Company at Connect@rallis.com.

8. Retention of Personal Information and Deletion of User Account

- 8.1. The Company shall retain information about User for the purposes authorized under this Privacy Policy unless prohibited by Applicable Laws.
- 8.2. Notwithstanding anything contained herein, Personal Information submitted by the User shall be retained by the Company under the following circumstances:
 - 8.2.1. to the extent as may be required under Applicable Law;
 - 8.2.2. the Company may retain User's Personal Information as may be relevant for any ongoing or prospective legal proceedings; and
 - 8.2.3. in the exercise of lawful rights which includes without limitation providing information to third parties for the purposes of prevention and reducing of credit risk.
- 8.3. Deletion of User Account.
 - 8.3.1. User may at any time delete their User Account by contacting the Company at Connect@rallis.com.
 - 8.3.2. The User shall have the right to restrict or prevent the continuing disclosure of the Personal Information by the Company where such disclosure has served the purposes as detailed under Clause 5.1 or is no longer necessary for such purposes or where the User has withdrawn the consent earlier given to the Company for disclosure of Personal Information. This option of restricting or preventing the continuing disclosure of the Personal Information by the Company may be exercised by the User by contacting the Company at Connect@rallis.com.

9. Protection/ Security of User's Personal Information

- 9.1. Privacy of the User is of utmost importance for the Company. Hence the Company provides privacy protection services as a default service to the User for no additional cost.
- 9.2. The Company has taken adequate measures to protect the security of User's Personal Information and to ensure that User's choices for its intended use are honoured. The Company takes precautions and has implemented reasonable physical, technical and administrative security standards to protect the Personal Information of the User from loss, misuse, unauthorized access or disclosure, alteration, or destruction.
- 9.3. To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, Company has put in place physical, electronic, and managerial procedures to safeguard and secure the information Company collects through the App and the provision of Company's Services.
- 9.4. User's Personal Information is never shared outside Company without User's consent/ permission, except under conditions explained under this Privacy Policy Within the Company, Personal Information is stored in password-controlled servers with limited access to the members and other personnel or consultants on a need-to-know basis.
- 9.5. The Company's service providers and agents are contractually bound to maintain the confidentiality of Personal Information and may not use the information for any unauthorized purpose.
- 9.6. To ensure safety of User's Personal Information, Users are advised against sharing their Account Information (*including passwords*) with anyone. Users should take steps to protect against unauthorized access to User's password, phone and computer by, among other things, signing off after using a shared computer, choosing a unique and robust password that nobody else knows or can easily guess, and keeping User's username and password, secure. Company is not responsible or liable for any lost, stolen, or compromised passwords, or for any activity on User Account via unauthorized password.
- 9.7. Any User who is residing outside India acknowledges that the Company is an Indian entity and hence makes no guarantee of being compliant with legal provisions of any other country except India. Any such User residing outside India should not proceed to provide any information or transact on the App unless they accept the privacy and security measures as set out under this Privacy Policy.
- 9.8. The User acknowledges that despite deployment of secure measures for protection of the User's information on the App, exchange and transmission of information online comes with inherent security risks and the Company makes no guarantee with regard to the safety of such transmission of User information through the App.

10. Third Party Privacy Policies

- 10.1. The App, the Services may contain components of services provided by TSPs and/or may contain links to the programming interface of the TSPs. Towards the same, information, including but not limited to Personal Information may be provided by User or be collected by such TSPs. This Privacy Policy shall not be applicable to any information exchanged between the User and the third parties. Towards such information exchange, User shall be bound by the privacy policies of such third parties. To the extent applicable, the privacy policies of such third parties shall be deemed to be incorporated herein.
- 10.2. In the event the User accesses and/or uses any third-party websites, links to which may be contained on the App and/or the Services, User is aware that such linked websites shall be governed by the privacy policies of such third parties. The Company shall not be responsible for the information practices of such third parties.

- 10.3. The Company encourages the User to read the Third Party Privacy Policies carefully to understand their practices regarding use of information provided by the User or collected by such third parties. The Company further encourages the User to exercise caution while sharing any information, including but not limited to Personal Information, with such third parties. It is clarified that the Company shall not be responsible for misuse of any information, including but not limited to the Personal Information of the User by any third parties.
- 10.4. Other portals that may be linked to the App may collect the User's Personal Information. The Company is not responsible for the privacy practices or the Content of those linked portals. The Company may indicate to the User that the User is getting linked to a third party portal. The User is required to carefully read and understand the terms of use or privacy policy of such third party portal, prior to browsing such portal or transacting thereon.

11. Communications from the Company

- 11.1. From time to time, Company shall communicate with the Users, who register and create a User Account on the App, via email or text message or telephone calls. It is hereby clarified that the Company shall only be sending Services related essential communications to the User and shall not be sending any unsolicited commercial email or spam.
- 11.2. The Company provides to the Users the opportunity to unsubscribe if they do not want to receive non-essential communication from the Company, such as emails or updates from the Company regarding new Services offered on the App or if Users do not want the Company to share or disclose their Personal Information with third parties. The option of preventing the continuing disclosure by the Company may be exercised by the User by contacting the Company at Connect@rallis.com.

12. Limitation of Liability

- 12.1. The Company is not responsible for any breach of security or for any actions of any third parties that receive the User's Personal Information.
- 12.2. Notwithstanding anything contained in this Privacy Policy or elsewhere, Company shall not be held responsible for any loss, damage, or misuse of the User's Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event. For the purposes of this Privacy Policy, a "Force Majeure Event" shall mean any event that is beyond the reasonable control of Company and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, epidemic, pandemic, civil commotion, strikes, lockouts or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, civil disturbances, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, and any other similar events not within the control of Company and which Company is not able to overcome.

13. Changes to This Privacy Policy

This Privacy Policy is subject to change at any time without notice. To make sure the Users are aware of changes, if any, Users are advised to review this Privacy Policy periodically. Any changes to this Privacy Policy will be posted on the App so that the Users are always aware of what information the Company collects, how Company uses it, and under what circumstances the Company discloses it. All information submitted through the App to Company is subject to the terms and conditions of this Privacy Policy, as amended from time to time.

14. Grievance Officer for Redressal

- 14.1. In accordance with Information Technology Act, 2000 and rules made thereunder, the name, contact details and designation of the Grievance Officer are provided below:

Grievance Officer: Mr.Piyush Alset
Designation: Senior Executive
Contact Number:

Address: 23rd Floor, Lodha Excelus, Off eastern freeway, Wadala, Mumbai,
Email: Connect@rallis.com
Timings: 09:00 AM - 05:00 PM (on all working days)

- 14.2. In the event of any complaint or any issue raised by the User, the same shall be acknowledged and redressed by the Grievance Officer within the timelines specified under Applicable Laws.
- 14.3. All words and expressions used herein and not defined, but defined in the Information Technology Act, 2000 and/or the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 shall have the meanings respectively assigned to them thereunder.

I have read, understood, and accept the Privacy Policy to download the mobile app.