

PRIVACY POLICY

This Privacy Policy was last updated: 11th April 2018

Note: All defined words in the Terms of Use would continue to have the same meaning in this Privacy Policy.

This Privacy Policy governs the manner of use of the Personal Information (as defined below) belonging to the Users gathered by LLP through the Website.

By (i) using this Website or any facility or service provided by this Website in any way; or (ii) merely browsing the Website, You agree that You have read, understood and agreed to be bound by this Privacy Policy ("**Policy**") and the other applicable terms, policies and rules available on the Website.

This Policy is an electronic record in terms of the Information Technology Act, 2000 and rules made thereunder. Further, this electronic record is generated by a computer system and does not require any physical or digital signatures. This electronic record is published in accordance with the relevant provisions of the Information Technology Act, 2000 and rules made thereunder.

Please note that this Policy is incorporated in and forms a part of the Terms of Use available on the Website and Additional Terms particular to any specific service provided through the Website, which shall be posted on the Website from time to time.

1. What This Policy Covers

- 1.1. This Policy explains how the LLP collects personal and non-personal information, classified as mandatory or voluntary and uses, discloses and protects such information through the Website. 'Personal Information' is data that can be used to uniquely identify or contact a single person ("**Personal Information**"). Personal Information for the purposes of this Policy shall include, but not limited to, information provided while using the Website, while agreeing to be contacted by the representatives of the Website, uploading content, communicating with LLP's customer service by phone, email or otherwise, reviews for the content available on the Website etc. that may or may not be otherwise publicly available.
- 1.2. This Policy does not apply to the practices of entities that are not owned, controlled, managed or operated by LLP or to persons that LLP does not employ, engage or manage.

2. Information Collection and Use

- 2.1. LLP may collect and store Personal Information when You use and/or register on the Website and when you permit the LLP to contact you by giving your details.

2.2. When You access or register on the Website, LLP may ask for information which is mandatory such as Your name, address, email address, phone number, business information, professional information, qualifications, details of profession and certain other information which is optional. Wherever possible, LLP indicates which information is mandatory and which information is optional for You to share with LLP. Once You access the Website and use it, You are not anonymous to LLP.

2.3. LLP may use Your information for the following general purposes:

- a) to contact You;
- b) to facilitate provision of specific information that you may require or address queries that you may raise;
- c) to administer LLP's business and Website;
- d) to send You marketing related communications;
- e) to deal with enquiries and complaints raised by You and to troubleshoot problems;
- f) to prevent the Website from fraud, errors or any illegal activity;
- g) to ensure compliance with all applicable laws and to ensure safety of the Website and all Users;
- h) to send You important information regarding the Website, changes to Website terms, conditions, and policies and/or other administrative information;
- i) to personalize Your experience on the Website and LLP's other websites by presenting advertising, products and offers tailored to You;
- j) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law;
- k) to carry out market research and Users' interest;
- l) to compile, evaluate, analyse and publish information on a consolidated basis in any form through any media, including Your Information in an anonymous manner; and
- m) to customise Your experience of use of the Website.

2.4. If You post any messages or leave any feedback on the Website, LLP may use such information for dispute resolution, troubleshooting problems and provide customer support.

3. Information Sharing and Disclosure

3.1. Some of the pages on the Website are freely accessible by all Users and require no prior Registration. LLP does not guarantee any security or privacy of any information which may be available to all Users and visitors of the Website publicly. Further, the Website may contain links to other websites. Please note that LLP does not endorse any links or websites and are not responsible for the privacy practices of such third party websites.

3.2. LLP does not rent, sell, disclose or share Personal Information about You with other people or non-affiliated companies except to provide services You've requested. However, You agree that in addition to as may be provided in this Policy, LLP may also disclose Your Personal Information under the following circumstances:

- a) Third party service providers: LLP employs or might, as per requirement and business needs of LLP, employ, engage, contract with third party service providers to work on behalf of or with LLP, under agreements containing confidentiality obligations and in accordance with law, in relation to the Services provided on the Website. These third party service providers may use Your Personal Information in assisting us to communicate with You about information, assisting in advertising on the Website, etc. Such third party service providers do not have any independent right to the information provided by LLP to them;
- b) Compliance with laws and protection of Users: LLP may release Your Personal Information when the same is required in order to comply with the law, in response to court orders, court summons, judgments, decrees, injunctions, arbitral awards, administrative orders, governmental investigation or orders of any government authority or any other legal process, to establish/exercise LLP's legal rights or defend against legal claims or in the event LLP reasonably believes that doing so is legally required or is in Your interest to protect Your property or other legal rights or property or rights of others. LLP may also share Your Personal Information in order to enforce and fully comply with LLP's Terms of Use and Additional Terms;
- c) Business transfer and Mergers: LLP may transfer Your Personal Information if LLP, is acquired by or merged with another entity, to the extent permitted by applicable law and/or there is change in ownership, etc.
- d) Contracting parties: LLP transfers/shares Your information with based on the assistance sought by You.
- e) With your consent: in addition to the aforementioned circumstances, we may share Your Personal Information with third parties with Your prior consent and/or at your request.

4. Cookies

4.1. LLP may place text files in the browser files of Your computer system. A cookie itself does not contain Personal Information and it will only enable us to relate Your use of the Website and/or services and Your behaviour on the Website, to information that You have specifically and knowingly provided. The only Personal Information that a cookie

can contain is the information You yourself supply to the cookie. A cookie can't read data off Your hard disk or read cookie files created by other websites.

- 4.2. LLP uses cookies to track User traffic patterns on the Website and their use of the services. LLP does not use cookies to track Your use of third party websites, applications or software. Please also note that LLP does not control use of cookies by any third party.
- 4.3. LLP may place both permanent and temporary cookies. A permanent cookie will remain on Your web browser until its expiry date, unless deleted prior to such expiry date. However, most cookies are "session cookies" meaning that they automatically get deleted from Your computer system at the end of the session. You can refuse cookies by turning them off in Your browser or alternatively You can also set Your browser to warn You before accepting any cookies. Therefore, You are always free to decline our cookies if Your browser permits.

Please note that some other features and services may still not function properly or conveniently on Your computer system if the other cookies placed by LLP on your hard drive are disabled.

5. Confidentiality and Security

- 5.1. LLP limits access to Personal Information about You to such persons who LLP believes reasonably need to come into contact with that information to provide services to You or for the purposes of proper functioning of the Website.
- 5.2. LLP has physical, electronic, and procedural safeguards that comply with its legal responsibilities to protect Personal Information about You.
- 5.3. LLP takes Your security seriously and take reasonable steps to protect Your information. No data transmission over the internet or information storage technology can be guaranteed to be absolutely secure.

6. Changes to this Privacy Policy

- 6.1. LLP may update, revise or amend this Policy from time to time without any prior notice to You. When LLP revises, updates or amends this Policy, it also revises the date at the start of the Policy. LLP encourages You to periodically review this Policy to stay informed about how LLP is protecting the information it collects. Your continued use of the Website constitutes Your agreement to this Policy and any updates from time to time.

7. User Discretion

- 7.1. You can always choose not to provide information and in such cases, if the information required is classified as mandatory, You will not be able to avail or access that part of the features or content.
- 7.2. LLP may, if You so choose, send direct advertisement mailers to You at the address given by You. You have the option to opt-out of this direct mailer by clicking at the unsubscribe link option attached to e-mail. LLP respects Your privacy and if You do not want to receive e-mail or other communications from LLP or use Your Personal Information, please report to LLP at contactus@vitalisphagetherapy.com

8. Grievance Officer

The details of the Grievance Officer and the manner of contacting him in case of any concern/grievance with respect to the contents on the Website and/or if there has been violation of this Policy is as per the relevant clause of the Terms of Use.