# **PRIVACY POLICY**

This Privacy Policy (Policy) governs the manner in which TAKEONE JK MEDIA PVT LTD (the Company or We) collects, uses, maintains and discloses information collected from the users (each, a User) of various services (Services) provided by the Company, either through website of the Company or through mobile applications or network telecom operators to protect the privacy of personal information of our customers which has been provided to us in order to access our services. Our Privacy Policy is designed and developed to ensure the privacy and security of Customer's sensitive personal information provided to us. For the purpose of this policy, sensitive personal data or information of customer's has been considered as a part of personal information.

The policy is designed to make you understand:

- What we collect
- What we do with the personal information we gather
- Collection of personal Information
- Collection of Non-Personal Information
- Use of Personal and Non-Personal Information
- Purpose of collecting personal information
- Sharing of information with Authorities
- Security
- How we use cookies
- Disclosure, Sharing and Transfer of Personal Information
- Retention of Personal Information
- Third party websites
- Advertising
- Changes To This Privacy Policy
- User acceptance of these terms

This policy is provided for your information and is not intended to limit or exclude your rights under laws and regulations applicable in India.

What we collect

We may collect personal information from User in a variety of ways, including, but not limited to, when User accesses and uses the Services and in connection with other activities, services, features or resources we make available on the Services. User may be asked for, as appropriate, name, email address, address, phone number, credit card information, demographic information such as postcode, preferences and interests etc. We will collect personal identification from User only if they voluntarily submit such information to us. User can always refuse to supply personal information, except that it may prevent them engaging in certain Services related activities

we do with the personal information we gather

We may use your personal information to:

- nister the Services;
- Personalize the Services for User;
- Send to User direct links to the Services;
- Process transactions;
- Process installation;
- Send User our newsletter;
- Develop, deliver, and improve our products, services, content, and advertising;
- Send important notices, such as communications about purchases/downloads and changes to our Policy.
- Auditing, data analysis and research to improve the service

**Collection of Personal Information** 

Personal information is any information that can be used to uniquely identify a person. We may collect your personal information as required under laws and regulations the time you subscribe and use our services or websites or otherwise interact with us, or from other sources like third parties.

- Information we collect about you will depend on the TAKEONE JK MEDIA products and services you use and subscribe to. The information we may collect includes, but is not limited to, the following:
- Your name, address, phone number, date of birth and email address.
- Your preferences for particular products, services or lifestyle activities when you tell us what they are or when we assume what they are based on how you use our products and services.
- Your contact with us, such as: a note or recording of a call you make to one of our contact centers, an email or letter you send to us and other records of any contact you have with us.
- Your account information, such as: dates of payment owed and received; top-up information; the subscription services you use; and any other information to do with your account.
- We collect information about how you use our products and services, and during this process we collect information such as: Your Call data records, your traffic data such as the phone numbers that you call and send messages to (and the phone numbers that you receive calls and messages from) and the date, time, duration and cost of your communications including your phone location at the time these communications are made. We collect your spend, your device details, your phone usage (including voice, messaging, web/ WAP use, application use), your purchasing habits, your location, your searching and browsing history (including the date, time and duration of your internet session) and your preferences (i.e. tracking our website usage information and other information that you may provide to us from time to time for the services that you receive from TAKEONE JK MEDIA . We may use cookies and other techniques, such as web beacons, to collect information about how you use our website for you so that it is relevant to your interests and needs. If required for

business and to provide better services to you, we may acquire your information from our business partners and third parties (during our business association with them), while you are availing their service through us. If you give us information about another person (who is an TAKEONE JK MEDIA Subscriber or otherwise), perhaps when they receive a service you are paying for or a service you have recommended, we expect you to be responsible for ensuring that they know we are keeping records about them and we are processing their personal information in accordance with this privacy policy.

Collection of Non-Personal Information

We may collect non-personal information about User whenever they interact with our Services. Non-personal information may include the browser name, the type of computer and technical information about means used by the User to connect to our Services, such as the information about the operating system and the internet service providers utilized and other similar information

Use of Personal Information and Non-personal Information:

This information is aggregated and used to help us provide more useful information to the User and to understand which part of the Services, its products and services are of most interest. We use your personally identifiable information to support and enhance your use of the Site and its features, including, without limitation, fulfilling your order, providing customer service, tracking email invitations you send, and otherwise supporting your use of the Site

If you have opted to receiving marketing material from us, we may also provide your personal information to carefully selected third parties who we reasonably believe provide products or services that may be of interest to you and who have been contracted with TAKEONE JK MEDIA to keep the information confidential, or who are subject to obligations to protect your personal information.

We may permit certain trusted third parties to track usage, analyse data such as the source address that a page request is coming from, your IP address or domain name, the date and time of the page request, the referring Web site (if any) and other parameters in the URL. This is collected in order to better understand our Web site usage, and enhance the performance of services to maintain and operate the Site and certain features on the Site. We may use third parties to host the Site; operate various features available on the Site; send emails; analyse data; provide search results and links and assist in fulfilling your orders.

We cannot protect any information that you make available to the general public in any publicly accessible area of our website or any other media. We use nonidentifying and aggregate information to better design our website and for business and administrative purposes. We may also use or share with third parties for any purpose aggregated data that contains no personally identifiable information. If we do combine non-personal information with personal information, the combined information will be treated as personal information for as long as it remains combined

Purpose of collecting personal information

Your personal information may be used & analyzed for various lawful purposes including enrichment of service experience. These include, but are not limited to:

- Provide, maintain and improve our products and services;
- Verify your identity as mandated by laws and regulations;
- Carry out a credit check if you are applying for a contract for airtime services and to assess your application;
- Process the goods and services that you have bought from us and keep you updated with the progress of your order;
- Keep you informed about new products and services unless you do not want to receive our marketing messages;
- Provide the relevant service or product to you, which includes other services not included in your agreement with us and services that use information about where you are when using your mobile equipment (location information), and to contact you with service-related messages about changes to the service or product;
- Contact you with offers or promotions based on how you use our products and services, including your calling and messaging activities, location information and browsing information (unless you have asked us not to contact you);
- Bill you for using our products or services or to take the appropriate amount of credit from you;
- Respond to any questions or concerns that you may have about using our network, products or services;
- Let you know about products and services offered by other companies (including offers and discounts that we have specially negotiated for our customers that we think may interest you, if you have chosen to receive this information;
- Understand how our different customers use our network, products and services so we can develop more interesting and relevant products and services for our customers, as well as personalize the products and services we offer you;
- Carry out research and statistical analysis and monitor customer use of our network, products and services on an anonymous or personalized basis;
- Ensure adherence to legal regulatory & business requirements for prevention and detection of frauds and crimes.

We will store your information for as long as we have to by law and as per directions of the regulatory & law enforcement Authorities. If there is no legal requirement, we will only store your information for as long as we need it for providing services to you.

Sharing of information with Authorities

We may share Personal Information as well as non-personal information of the User with the courts, police authorities or any other government/regulatory/statutory authority, in case these are required by them in relation to any proceedings pending before them

## Security

We are committed to ensure that User's personal information is secure. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of the User personal information, username, password, transaction information and data stored in our Services. To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic, and managerial procedures to safeguard and secure the information and data stored on our system. While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved

When a User uses services and products offered by us through the Services, the personal information shared by User is visible to the other users and can be read, collected, or used by them. The User is responsible for the personal information User chooses to submit in these instances. For example, if the User lists his/her name and email address in a blog/forum posting, that information is public. Users are requested to take care when using these features We adopt reasonable security practices and procedures, to include, technical, operational, managerial and physical security control measures in order to protect your personal information from unauthorized access, or disclosure while it is under our control.

Our security practices and procedures limit access to personal information on a need to know basis. Further, our employees, to the extent they may have limited access to your personal information on a need to know basis, are bound by the Code of Conduct and Confidentiality Policies which obligate them to protect the confidentiality of personal information.

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. We take adequate steps to ensure that our contracted third parties adopt reasonable level of security practices and procedures to ensure security of personal information.

We may retain your personal information for as long as required to provide you with services or if otherwise required under any law. We, however, assure you that TAKEONE JK MEDIA does not disclose your personal information to unaffiliated third parties (parties outside TAKEONE JK MEDIA's corporate network and its Strategic and Business Partners) which could lead to invasion of your privacy.

When we dispose off your personal information, we use reasonable procedures to erase it or render it unreadable.

No data transmission over the Internet is completely secure and for reasons outside of our control, security risks may still arise. Any personal information transmitted to us or from our online products or services will therefore be your own risk. However, we will strive to ensure the security of your information. We observe reasonable security measures to protect your personal information against hacking and virus dissemination. This privacy policy applies to information collected through all channels by TAKEONE JK MEDIA in the due course of business.

### How we use Cookies

A cookie is a small file which asks permission to be placed on the User's desktop/laptop/mobile device's memory drive. Once the User agrees, the file is added and the cookie helps analyse web traffic. Cookies allow Services to respond to the User as an individual. The Services can tailor its operations to the User's needs, likes and dislikes by gathering and remembering information about the User's preferences.

Cookies help us better understand User's behaviour, and tell us which parts of the Services Users have visited and facilitates and measure the effectiveness of products and services offered by us. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that internet protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. We use traffic log cookies to identify which pages are being used.

This helps us analyse data about web page traffic and improve our Services in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide User with a better experience of the Services, by enabling us to monitor which pages Users find useful and which the Users do not. A cookie in no way gives us access to the User's desktop/laptop/mobile device or any information about the User, other than the data a User chooses to share with us.

A User can choose to accept or decline cookies. Most web browsers automatically accept cookies, but a User can usually modify its browser setting to decline cookies if the User prefer. This may prevent the User from taking full advantage of the Services.

Disclosure, Sharing and Transfer of Personal Information

We may disclose and/or transfer your personal information or other information collected, stored and processed by us to our partners, affiliates, our group company only in case it is necessary for providing and improving services to you. Such affiliates and partners though external to TAKEONE JK MEDIA, are covered by contractual agreements. These agreements in turn include TAKEONE JK MEDIA's guidelines to the management, treatment and secrecy of information. This may also include sharing of

aggregated information with them in order for them to understand our environment and consequently, provide you with better services.

We may share information about you with:

- Our group company;
- Partners or agents who are involved in delivering the products and services you have ordered or used;
- Credit-reference agencies, fraud-prevention agencies, business-scoring agencies or other credit-scoring agencies;
- Debt-collection agencies or other debt-recovery organizations;
- Law-enforcement agencies, regulatory organizations, courts or other public authorities if we have to or are authorized to by law; or
- Emergency services (if you make an emergency call), including your approximate location.
- Business partners of ours in delivering and improving

If we are reorganized or are sold to another organization, we may transfer any personal information we hold about you to that organization.

TAKEONE JK MEDIA will not disclose, use, give or sell any personal information to third parties for any purposes other than to our suppliers and other third parties who need to know in order to deliver services to you on behalf of TAKEONE JK MEDIA , unless required to do so by law. Further, TAKEONE JK MEDIA may use this information to contact you regarding matters relevant to the underlying service provided and/or the information collected.

**Retention of Personal Information** 

We will retain User's personal information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law.

Third party websites

Users may find advertising or other content on the Services that link to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these sites and services and are not responsible for the practices employed by those websites and services linked to or from our Services. In addition, these sites and services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites and services which have a link to the Services, is subject to that websites and services own terms and policies

Advertising

Advertisement appearing on the Services may be delivered to the User by advertising partners, who may set cookies. These cookies allow the ad server to recognize the User computer each time they send the User an online advertisement to compile non personal information about the User or others who use the User computer. This information allows advertisement networks to, among other things, deliver targeted advertisements that they believe will be of most interest to the User. This Policy does not cover the use of cookies by any advertisers

### Changes To This Privacy Policy

The Company has the discretion to update this Policy at any time. We encourage User to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. User acknowledges and agrees that it is his/her responsibility to review this Policy periodically and become aware of modifications.

#### User acceptance of these terms

By using the Services, User signifies his/her acceptance of this Policy. If the User does not agree to this Policy, please do not use the Services. User continued use of the Services following the posting of changes to this Policy will be deemed User acceptance of those changes.