

Privacy Policy

Our Privacy Policy

Last updated on: May 12, 2022

Thank you for your interest in Zifrr. We welcome you to our software, as well as all related websites, mobile applications, web applications and products and services provided by us. Zifrr is a platform which provides a place for users to connect with like-minded individuals, collaborate and solve each other's problems and issues. In Zifrr, interactions by users are in the forms of textual questions and video answers. Zifrr offers the platform to you to discover, interact and transact with others directly through the in-built interface of Zifrr ("**Services**").

This document, i.e. Privacy Policy ("**Policy**") contains the manner and details in which **MarchingBytes Technology Solutions (OPC) Private Limited**, that owns and controls the platform known as Zifrr ("**Zifrr**", "**we**", "**our**", "**us**", "**Software**", "**App**") collects and processes the data that you, the reader of this Policy ("**User**", "**you**", "**your**"), provide to us.

As you may have noticed, we collect and process certain data in the course of providing our Services, such as through the Software/ App/ website. We understand that the data that we may collect in the course of providing you Services, may contain information that is personal in nature. Since we value the privacy and security of your personal information as much as you do, we would like you to understand the exact nature of the personal data that we collect from you and how we will use it, store it and whom we may share it with.

Additionally, please also read our EULA for Zifrr available at www.zifrr.com. This Policy and the EULA are to be read in consonance and form part of a single understanding. Any capitalised terms not defined herein, shall be interpreted to mean as defined in the EULA.

1. WHAT IS THE AIM OF THIS POLICY?

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- 1.1. Broadly, this Policy governs the manner in which Zifrr handles all personal data provided by you while using the Services.

This Policy is specifically aimed at achieving the following:

- (a) Helping you understand the exact nature of the personal data that we collect;
- (b) Explaining why we collect and what we do with the personal data that you share with us; and
- (c) Explaining to you, your rights in relation to what personal data we use and how we can use it.

- 1.2. This Policy may get updated from time to time pursuant to change in applicable law, scope of our Services or otherwise. The date at the top of the Policy shall reflect the date on which the Policy was last revised. In the event there are material changes to the Policy, we may send you an additional notice by way of a notification or adding a statement on the Services. While we will try to keep you apprised of material policy changes, it is not our duty to inform you of any and every change that is brought about in this Policy and you should visit our website to peruse the Policy from time to time.

- 1.3. Should you have any questions or concerns in relation to this Policy, you are always welcome to contact us by writing to us at contact@marchingbytes.com and we'll endeavour to do our best to address them.

- 1.4. Although we aim to be completely transparent in the manner we choose to protect your privacy, you may not agree with some of the terms of this Policy. In that case, please remember it is your choice whether you wish to continue using our Services on the Software.

2. INFORMATION THAT WE COLLECT FROM YOU WHILE PROVIDING THE SERVICES

2.1. For effective and optimal utilisation of our Services, we collect certain user data from our users. Such information/ data is requested at the time of you logging in to the Software . The following type of user data is collected by us for our Services:

1	Your phone number;
2	Your name;
3	Access to your camera; microphone; photo gallery;
4	Your email address;
5	Topics of Interests

We would like to highlight that the aforementioned collection of data by us is always done subject to the terms of the EULA. We keep the legitimate interests of our users in mind at all times and any data collection and processing is done in accordance with applicable law. Availing our Services requires you to receive text messages (from us or third-party service providers) with One-Time Passwords (OTPs) for the purposes of registering on the App or for utilising third parties services which are offered as a part of the Software and its Services.

3. **INFORMATION THAT IS GENERATED BY YOU WHILE AVAILING THE SERVICES**

We understand that you will be sharing information with other users during the use of our Services. We may retain any of your information shared with other users (such as messages, media, voice messages, etc.) (“**Media**”). All such Media are stored either locally on your device or on our cloud servers.

4. **TECHNICAL INFORMATION COLLECTED BY US THROUGH YOUR USE OF THE SERVICES**

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Certain type of technical information is automatically collected by us when you use the Software or any of the Services available on the Software. Such technical information includes information about the type of device (such as unique device ID, network connection type, provider, network and Device performance, Device’s geographic location, browser type, operating system, version of the Software) on which the Software or our Services are being accessed on. All

information is collected with your consent pursuant to your acceptance of the EULA.

5. WHY WE COLLECT AND PROCESS PERSONAL DATA

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- (a) To allow us to create and administer your Account (as defined in our EULA) on the Software and provide support services.
- (b) To comply with legal obligations and requests by law enforcement.
- (c) To establish, exercise, or defend legal claims.
- (d) To conduct business planning and forecasting.
- (e) Financial and business interest in marketing, promotional, and advertising purposes.
- (f) To constantly enable us to diagnose and identify any technical advancements, troubleshoot issues.
- (g) Improve our Services and develop new services from time to time.
- (h) To detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Zifrr.

USAGE OF THE DATA

The different purposes for which we may use your information are:

- (a) To provide you with the Services and improve upon them.
- (b) To answer your questions or requests for information or handle your complaints.
- (c) To ensure that facilities provided by us on the Services are presented in the most effective manner for you and for your Devices.
- (d) To carry out our obligations arising from any agreements entered into between you and us.

- (e) To notify you about updates or changes to Services, website and the Software features and content.
- (f) To understand your geographic location to help us identify communities and provide access to services between circles of users by geographic and geo-fenced market (such as zip code, state or country).
- (g) To connect you to other users or third party service providers directly through the Software basis your interests and requirements (as informed by you through the Software).
- (h) To serve advertisements across your Devices in accordance with applicable law.
- (i) We may also ask you to complete surveys or participate in polls that we use for research purposes, although you have the option to not respond to them.

6. TRACKING TECHNOLOGIES

- 6.1. Zifrr and our analytics partners use technologies such as cookies, tags, and scripts to enable a service to recognize your Device so you don't have to provide the same data several times during one task, to recognize that you may have already given a username and password so you don't need to do it for every web page/data requested, and to measure how people are using the Services.
- 6.2. You may, receive advertisements/ notifications from us in relation to (i) our latest features on the Software/ App; or (ii) new products or features developed by us (including that of our affiliates); or (iii) suggestions from us to improve your user experience of Zifrr; or (iv) our advertisement partners
- 6.3. Please note that this does not opt you out of being served advertisements on Zifrr. You may continue to receive generic advertisements on the Zifrr platform apps.
- 6.4. We use cloud storage to store content data and preferences.

- 6.5. We use third party trackers to let us know when users have visited the App/ website and used the Services by “clicking-through” our sponsored advertising or content hosted on third party platforms. The Services use third party analytics code to gather statistical data. Such an analytics code sets cookies to help us accurately estimate the number of visitors to the App and the volume of usage of the Services. This is done to ensure that the Services are available when you want them and they are fast. We will acquire consent from you in order to use such trackers to the extent required under applicable law.
- 6.6. We also use mobile analytics software to allow us to better understand the functionality of our App on your phone. This App may record data such as how often you engage with the products, Services, the events that occur within the App, aggregated usage and performance data and where the App was downloaded from. We may also link such data stored within the analytics software to any personal data that you submit within the App.
- 6.7. Certain features may collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy statement of the company providing these features.

7. COOKIE POLICY

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7.1. INFORMATION COLLECTED USING COOKIES AND OTHER WEB TECHNOLOGIES

Like many website owners and operators, we, may use cookies, webviews pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our Services. We use Technologies that are essentially small data files placed in a Device that allow us to record certain pieces of information whenever you open or interact with our Services, and to recognize you across Devices. We use automated data collection tools such as cookies and web beacons to collect certain information.

7.2. COOKIES

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A cookie is a small text file that is placed on the storage drive of your Device by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Web beacons, tags, and scripts may be used on the website or in emails to help us deliver cookies, count visits, understand usage and advertising campaign effectiveness, and determine whether an email has been opened and clicked on. We may receive reports based on the use of the Technologies by our service/ analytics providers on an individual and aggregated basis.

7.3. *Why does Zifrr use cookies?*

When you visit our website, we may place a number of cookies in your browser. These are first-party cookies, and they allow us to hold session information as you navigate within the site. For example, we use cookies on our website to improve your experience, and track and analyse usage, navigational, and other statistical information. You can control the use of cookies at the individual browser level. If you choose not to activate cookies or to later disable them, you can still visit our website, but your ability to use some features may become limited.

7.4. *Cookies Zifrr uses*

Many jurisdictions require or recommend that website operators disclose the type of cookies they use and occasionally get consent from Users before placing certain cookies.

We may use any of the following categories of cookies on our Software or its website as detailed below. Each cookie may fall within one of these 4 (four) categories:

Essential Cookies	Essential cookies (first-party cookies) are sometimes called “strictly necessary” as without them we cannot provide many services that you need on a website. For example, essential cookies help remember your preferences as you move around the website or the Software.
Analytics Cookies	These cookies track information about website/ Software visits so we can make improvements and report our performance. These cookies collect information about how visitors use the website/ Software, which site the User came from (in case of website), the number of each User’s visits, and how long a User stays on the Software / website. We might also use analytics cookies to test new features to see how Users react to them.
Functionality or Preference Cookies	During your visit to the website or use of the Software, these cookies are used to remember information you have entered or choices you make such as your username, language, or region. They also store your preferences when personalizing the Software / website to optimize your use of the same, for example, your preferred language. These preferences are remembered through the use of the persistent cookies, and the next time you visit the Software / website you won’t have to set them again.

8. SENSITIVE DATA

When you make an Account with us on the Software and use the Services, you have access to features that allow you to share information on the Software / website. Some of the information you choose to provide us may be considered “special” or “sensitive” in certain jurisdictions. By choosing to post this information on the Software / website, you consent to our processing of that information.

9. YOUR RIGHTS OVER THE PERSONAL DATA THAT YOU SHARE WITH US

10. WHO DO WE SHARE YOUR DATA WITH?

Your rights	Explanation
Right to confirmation and access	The right to be informed of, and request access to your personal data that is collected and processed by us.
Right to correction, rectification, and erasure	The right to request that any incomplete or inaccurate personal data provided be updated, corrected or erased.
Right to restrict	The right to request that we temporarily or permanently stop processing all or some part of the personal data that you provide to us.
Right to object	<p>a) The right, at any time, to object to us from processing your personal data on grounds relating to your particular situation;</p> <p>b) The right to object to your personal data being processed for direct marketing purposes.</p>
Right to data portability	The right to request a copy of your personal data in an electronic format and the right to have such personal data transferred or transmitted to a third-party service.
Right to not be subject to automated decision making	The right to not be subject to a decision based on automated decision making basis the personal data that you share with us. This includes profiling, in the event that such profiling would have a legal effect on you or a similar significant effect.

From time to time and in accordance with applicable law, we may share your personal data with third-parties such as (i) service providers and advisors; (ii) fraud prevention vendors; (iii) payment processors; (iv) law enforcement authorities; (v) our group companies, subsidiaries and affiliates; (vi) advertising partners; (vii) data analytical engines; (viii) social media partners of Ziffr (only to the extent required); (ix) any entity who seeks to acquire or invest in Ziffr.

11. HOW DO WE PROTECT YOUR DATA?

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- 11.1. We implement technical and organisational measures to help protect the security of your personal data including pseudonymisation, anonymisation, encryption, access, and retention policies to guard against unauthorised access and unnecessary retention of personal data in our systems.
- 11.2. Everything is stored on cloud storage, the highest order of security, and it is backed by several security measures. Unfortunately, the transmission of information via the internet is not completely secure. Although we implement and maintain reasonable measures to protect your personal information, we cannot guarantee the security of the information transmitted through our Services, therefore we do not assume any responsibility for any transmission of your information which you do at your own risk.

12. RETENTION AND DELETION OF DATA

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- 12.1. Retention of data: We collect and store your data for only as long as it is necessary for you to access your Account to use the Services on the Software / website. In addition to this, we may also retain your data for legitimate and essential business purposes, including but not limited to making data-driven business decisions, complying with legal obligations, as applicable, and resolving any disputes that may arise from time to time.
- 12.2. Deletion of data: Unless legally allowed or legally mandated to store such data, upon receiving a request, we will delete all your personal data or anonymize it so that such data is no longer identifiable to you as an individual.
- 12.3. Finally, and this is important, you should understand that users who see the content you provide can always save it using any number of techniques: screenshots, in-app functionality, or any other image-capture technology. It is also possible, as with any digital information, that someone might be able to access messages forensically or find them in a Device's temporary storage. Keep in mind that, while our systems are designed to carry out our deletion practices automatically, we cannot guarantee that deletion will occur

within a specific timeframe. And we may need to suspend those deletion practices if we receive a valid legal process asking us to preserve content or if we receive reports of abuse or other EULA violations.

13. TRANSFER OF DATA

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While Zifrr is based in India, we may transfer your data to third-parties that are located in countries other than India or to the country you are accessing the Services from. Therefore, your personal data may be subject to privacy laws that are different from your country. In such an instance, please note that Zifrr shall transfer your personal data in accordance with applicable privacy laws and your acceptance of the EULA and this Policy as well as use of our Services shall be considered as consent towards such transfer of personal data.

14. THIRD PARTY MICRO-APPLICATIONS AND LINKS

The Services offered on the Software may contain links to external websites or include micro-applications belonging to or developed by third parties integrated with the Software. We have no responsibility in relation to the accuracy, completeness and quality of the information contained within such third-party sites/ micro-applications and you agree that you access these sites at your own risk.

15. NON PERSONAL DATA

In the course of your usage of the Services or the Software, you would allow us to collect non personal data which will include the usage data collected in relation to needs, preferences, interests, shopping patterns, feedback, trends, demographics, onsite traffic metrics, social media engagement rate, conversion factors etc. of the users. Such data would not include any personal information which is non-anonymised. We will be entitled to use and exploit such data for the purpose of business development, creating product improvements and ensuring better Services to the users.

16. CONTACT US

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If you have any questions regarding this Policy, please feel free to reach out to us by contacting our Grievance Officer/ Nodal Officer [Mr Preet Kamal Singh Minhas] by writing an email to contact@marchingbytes.com or by writing to us at the following address mentioned below. Your grievances, if any, will be redressed within the period prescribed under applicable law.

MarchingBytes Technology Solutions (OPC) Private Limited

Registered Office:

#637, Phase 3A, Mohali, Punjab, India - 160055