

SWASTHYA USER PRIVACY POLICY

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BY ACCESSING THE PLATFORM, BY USING THE INTERMEDIARY SERVICES ("SERVICES") OR PROVIDING / MAKING AVAILABLE INFORMATION FOR USE BY US YOU AGREE TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO OUR COLLECTION, USE AND SHARING OF INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY AS WELL AS THE GENERAL PRIVACY POLICY SET FORTH ON THE PLATFORM.

BY USING THE PLATFORM AND/OR REGISTERING YOURSELF ON THE PLATFORM YOU AUTHORIZE US TO CONTACT YOU VIA EMAIL OR PHONE CALL OR SMS AND OFFER YOU OUR SERVICES, ASSIST YOU WITH THE SERVICES, SEND YOU INFORMATION ON YOUR SERVICES AND HSP'S, FOR WHICH REASONS YOUR INFORMATION MAY BE COLLECTED IN THE MANNER AS DETAILED UNDER THIS POLICY. YOU HEREBY AGREE THAT YOU AUTHORIZE US TO CONTACT YOU FOR THE AFOREMENTIONED PURPOSES EVEN IF YOU HAVE REGISTERED YOURSELF UNDER DND OR DNC OR NCPR SERVICE(S). YOUR AUTHORIZATION, IN THIS REGARD, SHALL BE VALID AS LONG AS YOUR ACCOUNT IS NOT DEACTIVATED BY EITHER YOU OR US.

WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE THE PLATFORM.

This privacy policy is published in compliance of Section 43A of the Information Technology Act, 2000; Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the "SPI Rules"); and Regulation 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

INTRODUCTION

Your use of the Platform is governed by this Privacy Policy and the Terms of Use. In addition, your usage of the Platform itself is governed by the Platform's General Privacy Policy and General Terms of Use.

If you are registering an account or using the Platform on behalf of an individual other than yourself, you represent that you are authorized by such individual to accept this Privacy Policy on such individual's behalf.

Any User may visit the Platform without revealing Personally Identifiable Information. However, in order avail Services, the User will need to provide certain data as set forth in this document. We track certain

non-personally identifiable Information for analytics and statistics. These details are essentially used to understand trend and provide better services.

We may track and process data about your use of our Platform and the services offered therein ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your service use. This usage data may be processed for the purposes of analyzing the use of the Platform and the Services.

We use third party analytics and tracking platforms, and thus all such data and information collected by us is stored with the relevant third-party.

SUMMARY

1. You are the owner of both personal and sensitive personal information you choose to share through the Platform.
2. By accessing this Platform, you understand the nature, purpose and consequences of the collection, use, storage, or disclosure of your information, including the digital health data, and hereby expressly provide your consent to the terms set forth herein.
3. In the event you avail services from or through us, we collect sensitive personal and other types of information from you for the purposes of providing Services.
4. Such information is shared with HSPs from whom you avail services, with other HSP's who may assist in the provision of services, and with other persons in the employ of the HSP or otherwise assisting the HSP with provision of services. Such information may also be held by us, for the purposes specified at the time of collection of the information, and for the duration for which the services are to be rendered, subject to the terms herein.
5. In the event we desire to have business relations with you in the future, we may retain your communication and other details, so we may contact you about our services.
6. We use processes, systems, and good practices (to the extent commercially reasonable) to protect the information you provide or make available to us.
7. We use 'cookies' & 'cache' on our Platform to see how people use the platform and to keep a record of whether you accept cookies or cache.

8. If you have any comments, questions, or concerns about this policy or how we store, process, and use data, please reach out to Grievance Officer at info@swasthya.ai.

COOKIES

Cookies are small pieces of information saved by the browsers. It is possible for you to set your browser to notify you whenever a cookie is sent to you, giving you the option to decide whether or not to accept it. Some cookies and other technologies may serve to recall Personal Information previously indicated by a user. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them.

Some of the web pages on our website may use cookies to serve you customized contents for your return visits to our website. Cookies also help us in authentication, enhancement of security, display targeted advertisement and most importantly, help us in future enhancements on the website and platform.

When you visit our Platform, we may place a number of cookies in your browser. These are known as First Party Cookies and are required to enable to hold session information as you navigate from page to page within the website. For example, we use cookies on our Platform to understand visitor and user preferences, improve their experience, and track and analyse usage, navigational and other statistical information. Additionally, cookies allow us to bring you advertising both on and off the Platform and bring customized features to you. You can control the use of cookies at the individual browser level. If you elect not to activate the cookie or to later disable cookies, you may still visit our Platform, but your ability to use some features or areas of the Platform may be limited.

WEB BEACONS

The Company occasionally advertises on third party websites. As part of our effort to track the success of our advertising campaigns, we may at times use a visitor identification technology such as "web beacons," or "action tags," which count visitors who have come to our site after being exposed to a banner ad on a third-party site. Our partners may also use web beacons to collect data in the aggregate as provided by your browser while you are on our site or another site where the Platform is third party.

By navigating on our site, you agree that we can place cookie and web beacons on your computer or device. If you prefer not to receive web beacons, then you should stop using our site, or consult your browsing settings.

THIRD-PARTY COOKIES

Please note that the third parties (advertising networks and providers of external services like web traffic analysis services) may also use cookies on our Services.

PERSONAL INFORMATION

In order for you to access the Platform and/or the Services, you will be required to provide us with certain information that personally identifies the person such information belongs to ("Personal Information"). Personal Information includes the following categories of information: Contact Data (such as e-mail address, phone number and user id/password), Registration Data (such as name and gender), and Usage Data. Usage Data may include physical, psychological, and mental health condition of the Users as well as their medical records and history, data relating to personal habits, and emergency contact information of the User.

The Information specified above and provided by Users may be classified as 'Personal Information' or 'Sensitive Information' under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011. Collection of information which has been designated as 'sensitive personal data or information' under the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules requires express consent of the owners of the information.

All Personal and Sensitive Personal Information is owned by the User to whom such information corresponds to.

INFORMATION COLLECTED BY MOBILE APPLICATIONS

Our Services are provided through our Mobile Applications as well. We may collect and use technical data and related information, including but not limited to, technical information about your device, system and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other services to you (if any) related to such Mobile Applications.

When you use any of our Mobile Applications, the Mobile Application may automatically collect and store some or all of the following information from your mobile device ("Mobile Device Information"), in addition to the Device Information, including without limitation:

- i. The manufacturer and model of your mobile device;
- ii. Your mobile operating system;
- iii. The type of mobile internet browsers you are using;
- iv. Your geolocation;
- v. Information about how you interact with the Mobile Application and any of our websites to which the Mobile Application links, such as how many times you use a specific part of the Mobile Application over a given time period, the amount of time you spend using the Mobile Application, how often you use the Mobile Application, actions you take in the Mobile Application and how you engage with the Mobile Application;
- vi. Information to allow us to personalize the services and content available through the Mobile Application;
- vii. Data from SMS/ text messages upon receiving Device permissions for the purposes of (i) issuing and receiving one-time passwords and other device verification, and (ii) automatically filling verification details during financial transactions, either through us or a third-party service provider, in accordance with applicable law. We do not share or transfer SMS/ text message data to any third party other than as provided under this Privacy Policy.

CONTROLLING PERSONAL INFORMATION

As a registered user of the Platform, you have the right to have any inaccurate personal or Registration Data about you rectified and have incomplete data about you completed. You can view your Personal Information in your account at any time and update it as necessary using your username and your password. Once we are informed, we will adjust incorrect data accordingly.

In the event you desire to withdraw consent to our processing of your information, kindly contact our Grievance Officer at info@swasthya.ai and we will cease to process the information unless we have legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise, or defence of legal claims.

Further, upon your request, the Company will use commercially reasonable efforts to delete your account from the Platform and the information in your profile relating to the Platform; however, it may be impossible to remove your account without some residual information being retained by the Company.

DATA PROCESSING

We may process your information included in your profile on Platform, including the Personal Information. This data along with any other electronic record generated is held by the Company in trust, on your behalf, for the duration of your usage of the Services and for such duration as deemed necessary by the Company. It is hereby specified that deidentified personal data of the Users shall be retained by the Company in perpetuity, in accordance with applicable laws.

We may process data about your use of our Platform and the services offered therein. The usage data may include your internet protocol address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of your use. The source of such data are third-party analytics platforms. This data may be processed for the purposes of analysing the use of the Platform and services.

We may also process information contained in any enquiry you submit to us regarding Services or contained in or relating to any communication that you send to us pertaining to the Platform. The correspondence data may include the communication content and metadata associated with the communication.

We may process any of your data identified in the other provisions of this policy, where necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. In addition to the specific purposes for which we may process your personal data set out, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

HSP'S USE OF YOUR INFORMATION

In the event you avail services from an HSP, any information you provide to the HSP may be used by the HSP during the course of provision of services and may be retained by the HSP as per applicable laws. Your information may also be shared by the HSP with other HSP's who may assist in the provision of services to you, and with other persons in the employ of the HSP or otherwise assisting the HSP with provision of services to you.

OUR USE OF YOUR INFORMATION

We may use your Personal Information to recommend you Services. We may use your Registration Data, and other information to identify or interact with you on social media. We use your Registration Data to send you information about HSP's, the Users, the Company, our Services, or to contact you when necessary. We use your Contact Data to send you information about the Company, the HSP's, or our Services.

We may use your geolocation to provide services to you.

We may use your data to customize and tailor your experience on the Platform, in emails and in other communications, displaying content that we think you might be interested in and according to your preferences.

Without limitation to the foregoing, your information may be used:

- (i) To develop, enhance, market, sell or provide our products or services, or those of companies with which we have a commercial relationship;
- (ii) To communicate information pertaining to Services you avail;
- (iii) To issue invoices, administer accounts, collect, and process payments;
- (iv) To provide tips or guidance on how to use Platform, the facilities we offer, inform you of new features, or provide other information that may be of interest to you;
- (v) To personalize the service we provide to you, tailor your experience to your requirements and make more appropriate recommendations;
- (vi) To send you e-mails, e-newsletters, personalized offers via direct messaging or other communications about our services;
- (vii) To collect feedback on HSP's, Users, the Platform, or the Services;
- (viii) To process and track your transactions and to send you information about Us, our affiliates', service providers' and business partners' products and services and other information and materials that may be of interest to you;
- (ix) To audit compliance with our policies, contractual, and statutory obligations;
- (x) To prevent fraudulent transactions on the platform;
- (xi) To make and collect payments from Users and HSP's;
- (xii) To analyse software usage patterns for improving product design and utility;
- (xiii) To analyse, share, license, and otherwise commercially exploit anonymized / deidentified personal information of the Users; and
- (xiv) As permitted by, and to comply with, any legal or regulatory requirements or provisions; or for any other purpose to which you consent.

DISCLOSURE OF INFORMATION

Except as described in this Policy, we will not, without your consent, disclose information about you.

We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

1. Any information that you voluntarily choose to include in a publicly accessible area of the Platform will be available to anyone who has access to that content, including other Users and HSP's.
2. We will disclose information about you to HSP's and other third parties to assist you with Services.
3. We may work with third-party service providers to provide various services. These third-party service providers may have access to or process information about you as part of providing those services for us. Generally, we limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such information.
4. We may disclose information about you if required to do so by law or in the good-faith belief that such action is necessary to comply with state and central laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.
5. Further, as we use third party platforms, all data and information collected by us is stored with such relevant third-parties.

We also reserve the right to disclose information about you that we believe, in good faith, is appropriate or necessary to

- (i) take precautions against liability;
- (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity;
- (iii) investigate and defend ourselves against any third-party claims or allegations;
- (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available;
- (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

Information about Users may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of any insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

We may make certain aggregated non-personal information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our users' interests, habits, and usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Service.

DATA SECURITY

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. For example, we take physical and electronic process-specific security measures, including firewalls, personal passwords, and encryption and authentication technologies. Such measures include, but are not limited to, secure sockets layer encryption, routine security audits and scans, routine updating and patching of all servers, services, and applications, as well as usage of code intended to block attacks.

Although we make good faith efforts to store Personal Information in a secure operating environment that is not open to the public, you should understand that there is no such thing as complete security, and we do not guarantee that there will be no unintended disclosures of your Personal Information. If we become aware that your Personal Information has been disclosed in a manner not in accordance with this Privacy Policy, we will use reasonable efforts to notify you of the nature and extent of the disclosure (to the extent we know that information) as soon as reasonably possible and as permitted by law.

DATA RETENTION

As a general rule, the personal data that is processed by us as set forth herein is not retained for longer than necessary for the purpose for which it was processed. More specifically, we retain and delete your personal data as follows:

1. Usage data will be retained indefinitely for the purpose of monitoring the historical performance of our Platform.

2. Personal Information shall be retained till such time as you continue to avail our Services, following which an aggregate non personally identifiable version thereof may be retained.
3. Your account related data will be retained for a period of 5 years after our last transaction with you, after which it will be deleted unless required for auditing or legal reasons.

Notwithstanding the aforementioned, in some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the period we need to access the data for the provision of services, receiving payment, resolving business or other issues or any other auditing or legal reasons. Further, notwithstanding this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

UPDATES AND CHANGES TO PRIVACY POLICY

We may update this Privacy Policy at any time, with or without advance notice. In the event there are significant changes in the way we treat User's personally identifiable information, or in the Privacy Policy itself, we will display a notice on the Platform or send Users an email, as provided for above, so that you may review the changed terms prior to continuing to use the Services.

THIRD-PARTY SERVICES

The Platform contains features or links to websites and services provided by third parties, including services and products provided by HSP's. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy, and security, even if accessed through the Platform. We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Platform. We encourage you to learn about third parties' privacy and security policies before providing them with information.