

## **PRIVACY POLICY** (Updated June 26, 2020)

**Web Traverse (India) Private Limited** located at 301, Wi-Fi IT Park, 3d Floor, S.G.Barve road, Wagle Estate, Thane (W) India 400604 (“WTI,” “we,” “our,” or “us”) have the following Privacy Policy with respect to how we collect, use and disclose your personal information when you register for access to and use the website (or any website linking to this Privacy Policy) or in connection with your use of our mobile applications, whether accessed via computer, mobile device or other technology (collectively, the “Sites”). By clicking the “I agree” box at the bottom of the Privacy Policy during registration, you indicate your assent to all of the terms of this Privacy Policy and to the latest version of the privacy policy and applicable terms and conditions of use governing the Sites. If you do not agree with the terms of this Privacy Policy or the applicable terms of use, do not use the Sites or submit any personal information to us.

**Information We Collect** - “Personal Information” is data that can be used to uniquely identify or contact a person. If you wish to participate in the features and services the Sites offer, we ask you to provide certain Personal Information. How we collect this information will depend on how you choose to use our Sites and interact with us. We collect Personal Information that you provide to us directly when you conduct business with us, including via telephone, fax, email, or through your use of and interaction with us on the Sites. **The personal information requested is generally name, email address, mobile phone number, and payment and credit card information.** When we collect payment information directly from you, like credit card numbers and expiration dates, we transmit this data directly from you to the credit card processing company to process the payment you requested.

As you interact with the Sites, we also collect information automatically about your visit to our Sites such as your browser and operating system information, dates and times of a particular visit and/or click path taken through the Sites, lookup information, Internet Protocol (IP) address, Media Access Control (MAC) address, your product purchases such as media titles (and those titles you share with others), and information that may be publicly available (collectively, the “Usage Data”). The Usage Data may be used in aggregate form that does not identify you to us or in a form that may identify you to us. The Usage Data may let us know, anonymously or in a manner whereby your identity is known to us, which services and features you are using or accessing within our Sites (including, for example but without limitation, whether you may have accessed or downloaded

audiovisual material from the Sites), as well as the device type and hardware features, country and language of download.

**Information We Receive from Third Parties** - We may receive information about you from third parties. For example, if you are browsing another website and you opt-in to receive information from us, then that website may forward to us your email address and other information about you so that we may contact you as requested. In those cases, we will apply this Privacy Policy to any Personal Information received, unless we have disclosed otherwise.

**Cookies, Web Beacons and Analytics Services** - When you view the Sites, whether from your computer, tablet or mobile device, we may store some information on the device you use to access the Sites in the form of a “cookie.” Cookies are used by many websites to give users access to certain functions (e.g., for security purposes, to tailor communications with you, and to facilitate and personalize your experience while navigating the Sites). The information stored in the cookie can also be used to monitor a user's behavior on the Sites. You can configure your browser to reject cookies by modifying your browser settings, but if your browser settings do not accept cookies from us, then some functions of our Sites may not operate as intended and you may not have access to all the services, features and/or promotions we may offer. Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on web pages (or in email). Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns. Web beacons may be used to measure the effectiveness of our Sites and advertising in certain ways, such as by counting the number of individuals who visit our Sites or open and act upon an email message. You can make some web beacons unusable by rejecting cookies. As we mentioned above, we may also use certain analytics services and visit recognition software to improve the use and functionality of our Sites and to build a demographic profile.

**Do Not Track Requests** - Unless your browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data, including unique device identifier of the device used to access our Sites, device type used to access the Sites and its capabilities, operating system version, browser type and its capabilities, length of visits to the Sites and click path taken, lookup information and time spent on certain Sites)

invisible to usages analytics tools, we do not presently have the technological capability to omit you from usage analytics to the extent your browser only sends us a “do not track” message and does not otherwise screen you from tracking without any action on our part.

**How We Use Your Personal Information** - We collect and use your Personal Information to:

- register you as a new customer;
- process and deliver your order including, manage payments, fees and charges, and collect and recover money owed to us;
- manage our relationship with you which will include notifying you about changes to our terms or privacy policy;
- generate sales and activity reports for you and your upline
- enable you to partake in a prize draw, competition or complete a survey;
- administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- use data analytics to improve our website, products/services, marketing, customer relationships and experiences; and
- make suggestions and recommendations to you about goods or services that may be of interest to you.

**Your Choices** - You may choose not to provide certain Personal Information requested by us, but please be aware that you may be prevented from making full use of the features, services and/or promotions we offer. For example, we may require your name and email address to add you to an email newsletter list. We may require a home address, cell phone or telephone number to deliver physical products or notify you of special offers. You may opt-out of having your Personal Information used for commercial purposes. Users who no longer wish to receive our promotional communications may contact us by email to be removed from our lists. Be sure to include any contact information that you want removed from our promotional contacts list, including physical addresses, phone numbers, and email addresses (If you use more than one email address, send your opt-out email from each of your email addresses.) If you receive any online newsletter or similar promotional email communication from us, you will be given the option to “unsubscribe” from receiving further email communications from us at any time. In some cases, you may also visit our Sites which allow you to choose whether you wish to receive certain online newsletters and savings updates and to update your contact information. Your option not to receive promotional and

marketing material will not preclude us from corresponding with you, by email or otherwise, regarding your existing or past business relationships with us (e.g., any purchase of our products or use of our services or responses to requests for information you pose to us either through use of the Sites or by other means), and will not preclude us from accessing and viewing your Personal Information in the course of maintaining and improving our Sites and our services.

Under the terms of the Privacy Shield Policy, If you want to opt-out of receiving any communications from us or if your Personal Information changes (such as zip code, phone, email or postal address), you may correct, update or delete/deactivate your Personal Information at any time by sending an email to [DPofficer@webtraverseindia.com](mailto:DPofficer@webtraverseindia.com). We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

**Protecting Your Privacy** - To prevent unauthorized access to, maintain integrity of, and promote use of, your Personal Information for its intended purpose, we have put in place physical, electronic, and managerial controls. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to protect such information consistent with this Privacy Policy and applicable laws.

**Uploading Content** - You are solely responsible for the information and other content you post on or through our Sites. You understand that personal and other information that you post on or through public areas of our Sites are generally accessible to, and may be collected, viewed and used by, others (including other account holders), and may result in solicited or unsolicited messages or other contact from others. Users of our Sites are encouraged to exercise caution when posting Personal Information about themselves in public areas. You warrant that you have permission to use and share any third party information you post and you agree to indemnify, defend and hold harmless WTI from and against any claim, liability, cost and expense arising in connection with your posting of such information.

**Information We Share with Others** - We may use your Personal Information or disclose your Personal Information to third parties to protect the security and integrity of our Sites, to correct technical problems and malfunctions on our Sites, to technically process your information, to report potential violations of this Privacy Policy and our terms and conditions of use, to provide services essential to your mobile user experience or to take precautions against liability. We also may provide your Personal Information to third parties who provide services and functions on our behalf, such as to companies or individuals that jointly offer products and services and deliver products you ordered from us. We may provide your Personal Information to your credit card issuer, credit reporting and fraud checking agencies as necessary, to a third party for purposes of processing payments for services and products that you elect to purchase, and to debt collection agencies if you fail to pay monies owed to us. If you request services via a mobile device, your request will be transmitted via your mobile carrier's network and your carrier may have access to it. Consult your carrier's privacy policy for additional information. We do not knowingly permit third parties, except for those third parties operating analytics services at our request or authorized by law (i.e., law enforcement), to collect Personal Information from, or track you (i.e., to obtain traffic data through usage analytics tools) through, the Sites, but your Personal Information may nonetheless be visible to third parties through the Sites to the extent you make it public (for example, by posting content to public areas). Your Personal Information and Non-Personal Data may also be used by us or shared with our subsidiaries, affiliates, and other entities controlled by or under common control with WTI for internal reasons, primarily for business and operational purposes. We reserve the right to transfer any information we have about you in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our business. We also may disclose your Personal Information and Non-Personal Data to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating the terms of use of our Sites.

**Transfer of Data** - You acknowledge that any information you provide to us may be transferred to and stored in the United States or in other countries outside your country of residence. By using the Sites, or providing us with any information, you consent to the collection, processing, maintenance and transfer of such information in and to the United States or other locations. We will protect the privacy and security of Personal Information according to our Privacy Policy regardless of where we process or store it.

**Links** - Our Sites may contain links to other sites on the Internet which are not under the control of WTI. You acknowledge that we are not responsible for the accuracy or any other aspect of the content of sites we do not operate or control. Your accessing the links to any other sites is at your own risk and subject to the applicable privacy policies and terms and conditions of such websites. We encourage our users to be aware when they leave our Sites and to read the privacy statements of each website to which we may link that may collect Personal Information.

**Children** - The Sites are not intended for use by persons under the age of 18, and WTI does not knowingly solicit or collect Personal Information from persons under the age of 18. If we learn that we have collected the Personal Information from a person under 18 we will take steps to delete the information as soon as possible. If you are under the age of 18, please do not submit your email address or any other Personal Information to us through the Sites.

**Data Protection Officer** – Any and all issues and concerns about your personal data under this Privacy Policy should be directed WTI’s Data Protection Officer via email at [DPOfficer@webtraverseindia.com](mailto:DPOfficer@webtraverseindia.com) or you can write us a letter to our company address above.

**Data breaches** – In the unlikely event that a data breach occurs with respect to your personal information that requires notification under the law, you will be notified by us within the time period required by law.

**Notification of Changes** - We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Such changes, modifications, additions, or deletions shall be effective immediately upon posting unless otherwise indicated. Your continued use of any of our Sites after changes are posted will be deemed to constitute your agreement to and acceptance of such changes.

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