

Legal

Vjourno Technology Private Limited

Effective 02 October 2019

PRIVACY POLICY

Introduction

This policy describes the information we collect, how it is used and shared, and your choices regarding this information. We recommend that you read this along with our Terms and Conditions, which highlights key points about our privacy practices (including what information we collect, when we collect it, and how we use it).

Data Collections And Uses

Scope

This policy describes how VTPL and its affiliates collect and use personal information to provide our services. This policy applies to all users of our apps, websites, features or other services anywhere in the world, unless covered by a separate privacy policy. This policy specifically applies to:

- **Customers:** users who request or receive digital videos
- **Vjournalos:** users who provide videos individually or through their business entities, through the App

This policy also applies to those who provide information to VTPL in connection with an application to use our services, or whose information VTPL otherwise receives in connection with its services. All those subject to this policy are referred to as “users” for purposes of this policy.

The practices described in this policy are subject to applicable laws in the places in which we operate. This means that we only engage in the practices described in this policy in a particular region if permitted under the laws of those places.

Data Controller

The Information VTPL collects:

- Information that you provide to VTPL, such as when you create your VTPL account.
- Information created when you use our services, such as location, usage and device information.
- Information from other sources, such as VTPL partners and third parties that use VTPL APIs.

The following information is collected by or on behalf of VTPL:

1 Information you provide

This may include:

- **User profile:** We collect information when you create or update your VTPL account. This may include your name, email, phone number, login name and password, address, payment or banking/ payment wallet information (including related payment verification information), government identification numbers such as Adhaar UID, PAN, birth date/ date of incorporation, and photo. This also includes the preferences and settings that you enable for your VTPL account.
- **Background check information:** We may collect background check information if you sign up to use VTPL's services as a Vjourno. This may include information such as your professional history or criminal record (where permitted by law). A vendor may collect this information on VTPL's behalf.
- **Demographic data:** We may collect demographic information about you, including through user surveys. In some cases, we may also receive demographic information about you from third parties.

- **User content:** We may collect information that you submit when you contact VTPL customer support, provide ratings or compliments for other users, or otherwise contact VTPL.

2 Information created when you use our services

This may include:

- **Location Information:** Depending on the VTPL services that you use, and your app settings or device permissions, we may collect your precise or approximate location information as determined through data such as GPS, IP address and WiFi.
 - If you are a Vjourno, VTPL collects location information when the VTPL app is running in the foreground (app open and on-screen) or background (app open but not on screen) of your device.
- **Transaction Information:** We collect transaction details related to your use of our services, including the type of services you requested or provided, your order details, delivery information, date, location and time the service was provided, amount charged, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.
- **Usage information:** We collect information about how you interact with our services. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and third-party sites or service you were using before interacting with our services. In some cases, we collect this information through cookies, pixel tags, and similar technologies that create and maintain unique identifiers.
- **Device Information:** We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.
- **Communications data:** We enable users to communicate with each other and VTPL through the VTPL apps, websites, and other services. For example,

we enable users, and Vjournos, to call or text each other (in some cases, without disclosing their telephone numbers to each other). To provide this service, VTPL receives some information regarding the calls or texts, including the date and time of the call/text, and the content of the communications. VTPL may also use this information for customer support services (including to resolve disputes between users), to improve our products and services and for analytics.

▪ **Information from other sources**

These may include:

- User feedback, such as ratings or compliments.
- Users providing your information in connection with referral programs.
- Users requesting services for or on your behalf.
- Users or others providing information in connection with claims or disputes.
- VTPL business partners through which you create or access your VTPL account, such as payment providers, social media services, on-demand music services, or apps or websites who use VTPL's APIs or whose API VTPL uses (such as when you order a video through dropping a pin on Google Maps™).
- Publicly available sources.
- Marketing service providers.

VTPL may combine the information collected from these sources with other information in its possession.

How We Use Your Information

VTPL collects and uses information to enable reliable and efficient sourcing and delivery of its products and services. We also use the information we collect:

- To enhance the reliability of our services
- For customer support
- For research and development
- To enable communications to or between users
- To provide promotions or contests

- In connection with legal proceedings

VTPL does not sell or share your personal information to third parties for third party direct marketing purposes.

VTPL uses the information it collects for purposes including:

1 Providing services and features

VTPL uses the information we collect to provide, personalize, maintain and improve our products and services. This includes using the information to:

- Create and update your account.
- Verify your identity.
- Enable sourcing and selling of digital videos and other services. This includes automated processing of your information to enable Dynamic Pricing, in which the price of a video is determined based on constantly varying factors such as the estimated demand surge, and the number of Vjournos available with VTPL at a given moment at the desired location.
- Process or facilitate payments for those services.
- Offer, obtain, provide or facilitate insurance or financing solutions in connection with our services.
- To track the progress of the delivery of the digital video.
- Enable features that allow you to share information with other people, such as when you submit a compliment about a Vjourno or refer a friend to VTPL.
- Enable features to personalize your VTPL account, such as creating bookmarks for your favorite places, and to enable quick access to previous locations.
- Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

2 Safety and security

We use your data to help maintain the safety, security and integrity of our services and users. This includes, for example:

- Selectively screening Vjournos (on a random basis) prior to enabling their use of our services and at subsequent intervals, including through reviews of background checks where permitted by law, to prevent access to our services by people of suspicious antecedents.
- our Real-Time ID Check feature, which prompts Vjournos to share a selfie before submitting the video. This helps ensure that the Vjournos using the app matches the VTPL account we have on file, preventing fraud and helping to protect other users.
- Using device, location, profile, usage and other information to prevent, detect, and combat fraud or unsafe activities. This includes processing of such information to identify practices or patterns that indicate fraud or risk of safety incidents. This may also include information from third parties. In certain cases such incidents may lead to deactivation by means of an automated decision making process.

3 Using user ratings to encourage improvement by affected users, and as grounds for deactivating users with ratings below a certain minimum as may be required in their region. Calculation and deactivation may be done through an automated decision making process.

Customer support

VTPL uses the information we collect (including recordings of customer support calls after notice to you and with your consent) to assist you when you contact our customer support services, including to:

- Direct your questions to the appropriate customer support person
- Investigate and address your concerns
- Monitor and improve our customer support responses

4 Research and development

We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the efficiency, effectiveness and security of our services, develop new features and products,

and facilitate insurance and finance solutions in connection with our services.

5 Communications among users

VTPL uses the information we collect to enable communications between our users. For example, a user may text or call a Vjourno to confirm a location, or a brief about their order.

6 Communications from VTPL

VTPL may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events.

VTPL may also use the information to promote and process contests and sweepstakes, fulfill any related awards, and serve you relevant ads and content about our services and those of our business partners. You may receive some of these communications based on your profile as an VTPL user.

VTPL may also use the information to inform you about elections, ballots, referenda and other political and policy processes that relate to our services.

7 Legal proceedings and requirements

We may use the information we collect to investigate or address claims or disputes relating to your use of VTPL's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

Cookies And Third Party Technologies

VTPL and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this policy.

Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. **VTPL uses cookies and**

similar technologies for purposes such as:

- Authenticating users
 - Remembering user preferences and settings
 - Determining the popularity of content
 - Delivering and measuring the effectiveness of advertising campaigns
 - Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services
- We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services.

Information Sharing And Disclosure

VTPL may share the information we collect:

1 With other users

- For example, if you are a Vjourno, we may share your first name, average rating given by users, and phone number.
- If you are a Vjournalor, we may share information with customers including name and photo; phone make, model, color; location; average rating provided by users; total number of assignments completed; for how long you have been using the VTPL app; and contact information (depending upon applicable laws). If you choose to complete a Vjournal profile, we may also share any information associated with that profile, including information that you submit and compliments that past customers have submitted about you. The customer recipient will also receive a receipt containing information such as a breakdown of amounts charged, your first name, photo, and the location where the video was shot.

2 At your request

This includes sharing your information with:

- **Other people at your request.** For example, we may share your ETA and location with a customer at your request.
- **VTPL business partners.** For example, if you requested a service through a partnership or promotional offering made by a third party, VTPL may share your information with those third parties. This may include, for example, other apps or websites that integrate with our APIs, or services, or those with an API or service with which we integrate, or business partners with whom VTPL may partner with to deliver a promotion, a contest or a specialized service.

3 With the general public when you submit content to a public forum

We are keen to hear from our users -- including through public forums such as VTPL blogs, social media, and certain features on our network. When you communicate with us through those channels, your communications may be viewable by the public.

4 With VTPL subsidiaries and affiliates

We share information with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf.

5 With VTPL service providers and business partners

VTPL may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:

- Payment processors and facilitators.
- Background check providers (Vjournos only).
- Cloud storage providers.
- Marketing partners and marketing platform providers.
- Data analytics providers.

- Research partners, including those performing surveys or research projects in partnership with VTPL or on VTPL's behalf.
- Vendors that assist VTPL to enhance the safety and security of its apps.
- Consultants, lawyers, accountants and other professional service providers.
- Mobile Technology Partners
- Insurance and financing partners.

6 For legal reasons or in the event of a dispute

VTPL may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing your information with law enforcement officials, government authorities, or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies, to protect VTPL's rights or property or the rights, safety or property of others, or in the event of a claim or dispute relating to your use of our services. If you use another person's credit card or wallet, we may be required by law to share information with that credit card / wallet holder, including assignment information.

This also includes sharing your information with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

7 With your consent

VTPL may share your information other than as described in this policy if we notify you and you consent to the sharing.

Information Retention And Deletion

VTPL requires user profile information in order to provide its services, and retains such information for as long you maintain your VTPL account.

VTPL retains certain information, including transaction, location, device and usage information, for a minimum of 7 years in connection with regulatory, tax, insurance and other requirements in the places in which it operates. Once such information is no longer necessary to provide VTPL's services, enable customer support, enhance the user experience or other operational purposes, VTPL takes steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection.

You may request deletion of your account at any time through the Privacy Settings in the VTPL app, or via VTPL's website.

Following such request, VTPL deletes the information that it is not required to retain. In certain circumstances, VTPL may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, VTPL will delete your account as described above.

VTPL may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if VTPL shuts down a user's account because of unsafe behavior or security incidents, VTPL may retain certain information about that account to prevent that user from opening a new VTPL account in the future.

Choice And Transparency

A. PRIVACY SETTINGS

The Privacy Settings menu in the VTPL rider app gives users the ability to set or update their location and contacts sharing preferences, and their preferences for receiving mobile notifications from VTPL. Information on these settings, how to set or change these settings, and the effect of turning off these settings are described below.

▪ Location Information

- VTPL uses Vjournos device location services to improve our services, including assigning jobs, navigation, and customer support.

- You may enable/disable, or adjust, VTPL's collection of location information at any time through the Privacy Settings menu in the VTPL app, or via the settings on your mobile device. If you disable the device location services on your device, your use of the VTPL app will be affected. In addition, location information will be collected from the Vjourno during fulfillment of an assignment and linked to your account, even if you have not enabled VTPL to collect your location information.

▪ Share Live Location (Vjourno)

- If you have enabled the device location services on your mobile device, you may also enable VTPL to share your location with your customer from the time you accept an assignment request. This makes it easier for customer to track you and monitor the progress of an assignment.

- You may enable/disable location sharing with your customer at any time through the Privacy Settings menu in the VTPL app. You may use the VTPL app if you have not enabled location sharing, but it may be more difficult for your customer to locate you.

Notifications: Account and Updates

- VTPL provides users with status notifications and updates related to

your account. These notifications are a necessary part of using the VTPL app, and cannot be disabled. However, you may choose the method by which you receive these notifications through the Privacy Settings menu in the VTPL app.

Notifications: Discounts and News

- You may enable VTPL to send you push notifications about discounts and news from VTPL. You may enable/disable these notifications at any time through the Privacy Settings menu in the VTPL app.

DEVICE PERMISSIONS

Most mobile platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without your consent. And these platforms have different permission systems for obtaining your consent. The iOS platform will alert you the first time the VTPL app wants permission to access certain types of data and will let you consent (or not consent) to that request. Android devices will notify you of the permissions that the VTPL app seeks before you first use the app, and your use of the app constitutes your consent.

RATINGS LOOK-UP

After every trip, customers and vjournos are able to rate each other, as well as give feedback on how the assignment went. This two-way system holds everyone accountable for their behavior. Accountability helps create a respectful, safe environment for both the parties.

Your Vjourno rating is available in the main menu of the VTPL app.

Your customer rating is available in the Ratings tab of the VTPL Portal User section.

EXPLANATIONS, COPIES AND CORRECTION

You may request that VTPL:

- Provide a detailed explanation regarding the information VTPL has collected

about you and how it uses that information.

- Receive a copy of the information VTPL has collected about you.
- Request correction of any inaccurate information that VTPL has about you. You can make these requests by contacting VTPL at their registered office address. You can also edit the name, phone number and email address associated with your account through the Settings menu in VTPL's apps.

MARKETING OPT-OUTS

You may opt out of receiving promotional emails from VTPL by sending a mail to webmaster@vjournos.com. You may also opt out of receiving emails and other messages from VTPL by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages, such as receipts for your rides or information about your account.

Updates To This Policy

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through the VTPL apps or through other means, such as email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.