

Proximit Media India Pvt Ltd,

Privacy Policy

Created on: August 5, 2016

Last updated on: August 5, 2016

Intent: We know that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly.

This Privacy Policy explains how we, Proximit Media India Private Limited (trading as "Proximit" or "RIKY"), collect, process and use information of our users (hereinafter addressed as "you", "your", "yourself"). We are the operator of the website www.myriky.com, associated RIKY Ad Serving platform installed in public transit vehicles and RIKY Customer application installed on users phones and a provider of a range of services thereto. We provide a platform where we may list offers for local services, goods and travel which are made available by us or other sellers (collectively: "Sellers"). This Privacy Policy applies to information that we collect through our website, RIKY applications, electronic communications or services (collectively, the "Site").

We will routinely update this Privacy Policy to improve our practices and to reflect new or different privacy practices, such as when we add new services, functionality or features to the Site. You can determine when this version of the Privacy Policy was adopted by referring to the "Effective Date" above.

By visiting this Website you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree, please do not use or access our Website.

By mere use of the Website, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the Terms of Use.

Sensitive Personal Data and Information

Pursuant to the Information Technology Act, 2000, we are required to give a disclosure of the sensitive personal data and information collected by us and how do we use it. We may collect and retain the following information from and about you if you interact with us through the Site:

- your email address and Site password;
- your phone numbers;
- your location, website browsing patterns (e.g., through cookies), travel history and purchase history;

- other information you actively submit to us or we can determine about you based on your interactions with our Site and services.

We get access to such information when you:

- register, subscribe, authorize the transfer of, or create an account with us;
- open or respond to emails;
- provide information to enroll or participate in programs provided on behalf of, or together with other Sellers, merchants, co-marketers, distributors, resellers and other business partners, with your consent or as necessary to provide services you have requested;
- visit any page online that displays our ads or content;
- purchase products or services on or through the Site;
- interact or connect with or link to the Site via integrated social networking tools; and
- post comments to the Site.

Managing User Choices

You can manage the types of personal data you provide us and can limit how we communicate with you.

You can manage your email and notice preferences by logging into your account through the Site or by adjusting the settings in our mobile application.

You can also manage your subscriptions by following subscription management instructions contained in any commercial emails that we send you.

You may choose to subscribe to some types of messages, and may choose not to subscribe to, or to unsubscribe from, others.

You may update your subscription preferences at any time. Please note that even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important transactional information related to your account and your purchases. For example, even if you have unsubscribed from our promotional email messages, we will still send you confirmations when you make purchases on the Site.

You may manage how your browser handles cookies by adjusting its privacy and security settings. Browsers are different, so refer to instructions related to your browser to learn about cookie-related and other privacy and security settings that may be available. Please refer to Paragraph 11 of this Policy for information of Cookies for more information.

You may also manage how your mobile device and mobile browser share information on and about your devices with us, as well as how your mobile browser handles cookies by adjusting the privacy and

security settings on your mobile device. Please refer to instructions provided by your mobile service provider and the manufacturer of your device to learn how to adjust your settings.

You may also manage the sharing of certain personal data with us when you connect with us through social networking platforms or applications. Please refer to Paragraph 9 below and also the privacy policy and settings of the social networking websites or applications to determine how you may adjust our permissions and manage the interactivity between us and your social networking account or your mobile device.

If you register for customized email newsletters containing offers for local services, goods and travel, we will work to make information more relevant for you and customize newsletters based on information you share with us, your location, website browsing preferences (for example, through cookies), purchase history or based on other attributes of your relationship with us. You can reject and delete cookies and unsubscribe from newsletters at any time by clicking links in each newsletter you wish to unsubscribe from.

Use of Information

We process personal data for the following purposes:

- Operate, maintain and improve the Site;
- Provide you with personalized direct marketing initiatives via email and direct marketing offers;
- Facilitate and process orders – for example, for vouchers and other goods and services;
- Determine your eligibility for certain types of offers, products or services that may be of interest to you, and analyze advertising effectiveness;
- Answer your questions and respond to your requests;

To establish and analyze individual and group profiles and customer behavior;

- Communicate and provide additional information that may be of interest to you about us, the Sellers and our business partners;
- Send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, marketing messages, and requested information, including on behalf of business partners;
- Administer rewards, surveys, contests, or other promotional activities or events;
- Manage our everyday business needs, such as administration of the Site, analytics, fraud prevention, and enforcement of our corporate reporting obligations and Terms of Use or to comply with the law;
- Comply with our legal obligations, resolve disputes, and enforce our agreements;

- Allows you to sign up for special offers from merchants and other business partners through the Site; and to
- Enhance other information we have about you to help us better understand you, determine your interests and provide you with more relevant and compelling services

Disclosure of Information

We are not in the business of selling or renting personal data. We will not share your personal data, except in the following manner:

- with the Sellers, so they can sell and deliver to you;
- to report or collect on payments owed to Sellers, merchants or other business partners;
- as necessary to perform contractual obligations towards you with business partners to the extent you have purchased or redeemed a ProximiT voucher, goods or services offered by a business partner or participated in an offer, rewards, contest or other activity or program sponsored or offered through us or the Sellers on behalf of a business partner;
- in case of a merger, acquisition or reorganization with a purchaser of our company or all or substantially all of our assets;
- to comply with legal orders and government requests, or as needed to support auditing, compliance;
- to combat fraud or criminal activity, and to protect our rights or those of our affiliates, business partners and users, or as part of legal proceedings affecting ProximiT;
- in response to a legal process, including to law enforcement agencies, regulators, and courts; or

with your consent or as otherwise required or permitted by law.

We encourage business partners to adopt and post privacy policies. However, while we share personal data with business partners only for the above-mentioned purposes, their subsequent processing and use of personal data obtained through ProximiT is governed by their own privacy policies and practices and are not subject to our control.

Collection of Information: We collect your personal data, when you register, subscribe, create an account, make a purchase or redeem vouchers or otherwise contact us or communicate with us actively. For example, you provide personal data to us when you contact us online for customer service and other support using self-help tools, such as email, text, or by posting to online communities.

- when you interact with the Site via cookies and other technologies using cookies
- through other online and offline information from our business partners who may report to us redemption, collection, or refund-return events.

Security of Personal Information

We use strict security measures to ensure the security, integrity and privacy of Your Personal Information and to protect your Personal Information against unauthorized access or unauthorized alteration, disclosure or destruction. For this purpose, we have adopted internal reviews of the data collection, storage and processing practices and security measures, including offering the use of a secure server to guard against unauthorized access to systems where we store your personal data.

We shall, however, not be responsible for any breach of security or for any actions of any third parties that receive Your Personal Information. The Website is also linked to many other sites and we are not/shall be not responsible for their privacy policies or practices as it is beyond our control.

User's Rights in relation to Personal Data:

By keeping your personal data updated you can help us to ensure that we can respect your preferences and offer you the goods and services that are most relevant to you.

You can access, update, rectify, and delete your information you provided to us in your profile by logging into your account or contacting us at <http://www.myriky.com/contactus>.

While we are ready to assist you in managing your subscriptions, closing your account, and removing your active profile, we cannot always delete records of past interactions and transactions. For example, we may be required to retain records relating to previous purchases on the Site for financial reporting and compliance reasons.

Retention of Personal Data

You can at anytime unsubscribe from our services, newsletters, e-mailers. We will, however, retain your personal data for as long as your account is active or as needed to provide you services and to maintain a record of your transactions for financial reporting or other compliance purposes. We will also retain your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Social Site Features

The Site may contain connections to areas where you may be able to publicly post information, communicate with others such as discussion boards or blogs, review products and merchants, and otherwise submit your own original content. Prior to posting in these areas, please read our Terms of Use carefully. All the information you post may be accessible to anyone with Internet access, and any information you include in your posting may be read, collected, and used by others.

Connecting through Social Networks: We offer social networking users the opportunity to interact with friends and to share on social networks. If you are logged into both the Site and a social network, when you use the Site's social networking connection functions, you may connect your social network account with your ProximiT account (this happens automatically, if the email addresses match). If the email addresses do not match, we ask you if you want to link them and you must validate that you control the accounts. If you are already logged into the Site but not logged into your social network site, when you

use the Site's social network connection functions, you will be prompted to enter your social network website credentials or to sign up for the social network.

If you are not currently registered as a ProximiT/Riky user and you use the Site's social network connection functions, you will first be asked to enter your social network credentials and then be given the option to register and join ProximiT. Once you register with us and connect with the social network, you will be able to automatically post recent ProximiT activity back to your social network. Please refer to the privacy settings in your social network account to manage the data that is shared through your account.

By using the Site's social network connection function, you will grant us permission to access all of the elements of your social network profile information that you have made available to be shared (as per the settings chosen by you in your social network profile) and to use it in accordance with the social network's terms of use and this Privacy Policy.

Privacy Policies of Third Parties

This Privacy Policy only addresses the collection, processing and use (including disclosure) of information by us through your interaction with the Site. Other websites that may be accessible through links from the Site may have their own privacy policies and personal information collection, processing, use, and disclosure practices. Our business partners may also have their own privacy policies. We encourage you to familiarize yourself with the privacy policies provided by these other parties prior to providing them with information or taking advantage of a sponsored offer or promotion.

Cookies

Consent: By using our website or RIKY applications ("Site"), using services provided through the Site, or receiving our emails, you consent to the use of cookies in accordance with this "Cookies Policy".

Intent: This Privacy Policy sets out how we, and third parties we authorize, use cookies when you interact with our Site or the services offered via the Site. Our Privacy Policy explains what we do (and don't do) with the information, including any personal data we may collect about you. Please read them both.

Meaning: Cookies are unique identifiers, usually made up of small bits of text or code. Cookies are usually stored on your device or in your web browser and they send certain information back to the party who served the cookie. When we say cookies we are actually referring to a broader range of technologies than just cookies, including web beacons, clear gifs, pixels and other similar technologies. When we say first-party cookies we mean cookies that are served by ProximiT. When we say third party cookies we mean cookies that are served by non-ProximiT parties.

Use of Cookies: Cookies are used in order to better understand how applications and websites work and to optimize online and RIKY application experiences. Cookies do this by allowing the party serving the cookie to analyze a website's or mobile app's performance, to identify certain users anonymously and remember their preferences, to better understand whether a computer or device (and probably its user) has visited a website previously and to serve personalized advertisements.

Types of Cookies: Our Site primarily uses the following four types of cookies:

- **Operations based Cookies:** These cookies are essential for the operation of our Site. They make it possible for you to browse and use our Site. If you disable these cookies, the Site will not function correctly.
- **Performance based Cookies:** These cookies gather information about how visitors use the Site and monitor Site performance. For example, performance cookies tell us which pages are popular, monitor traffic to our Site and compile anonymous analytic information. Performance cookies can also be used to identify and remedy operational problems with the Site.
- **Functionality based Cookies:** These cookies are used to recognize and remember your preferences. For example, functionality cookies may use information, such as your location, to make sure that you arrive at a version of our Site that is specific to your city or region.
- **Advertising Preferences based Cookies:** We offer you choices about receiving interest-based ads from us. For this, we allow third parties to deliver personalised advertising content on our Site and/or on third party websites and applications. These third parties use cookies to understand your interest in the advertisements and content delivered to you, as well as to serve you with more relevant advertisements based on your activities on our Site. For example, third-party cookies could record information about whether you have clicked on certain content or advertisements on our Site or other websites, or placed an item on our Site in your shopping cart.

We do not have control over, or access to, third-party advertising cookies or the information they contain. Third parties manage any information that they collect via cookies they place in accordance with their privacy policies.

Cookies and Browser settings: You may be able to avoid certain cookies by configuring your browser settings or opting-out directly with the party that operates and controls the cookie. Please check your browser settings for more information.

Cookies in E-mails: Our emails contain cookies that track whether you open our emails and whether you click any links within them. The cookies used in our emails to monitor these behaviors are unique to each email and are not stored on your computer or mobile device.