

Privacy Policy

SCOPE AND PURPOSE

ANI Technologies Private Limited (“**Ola**”), is committed to respect your privacy and to comply with applicable data protection and privacy laws. This privacy policy (“**Policy**”) describes how we collect and use personal data where Ola is the data controller or where we refer to the applicability of this Policy. “**Personal data**” means information relating to you or another identifiable individual.

We will give you additional privacy information that is specific to a product or service in Supplements to this Policy and other notices you may see while using our products or services. If there is a difference between such notices and this Policy, the notices should be considered first.

Software on your device may access your information. Our products or services may contain links to, or may be embedded within, other companies’ websites and services that have privacy policies of their own. Where our products or services are embedded to products and services of our customers, we require our customers to provide necessary transparency to you. This might include linking to this Policy and the relevant Supplements, or providing the transparency in integrated and embedded notices which identify us as the service provider or controller.

If you do not agree with this Policy, do not use our products and services or provide Ola with your personal data and end user personal data. In the event of API or integration of SDK, You will execute the end user privacy policy as per our policy and legal requirements.

What information do we collect?

We collect your personal data and other information when you make a purchase, use or register into our products and services, take part in campaigns or research or otherwise interact with us. This includes following categories

Product and service activations

Ola products and services may require electronic activation, where your device and application type, as well as unique device, application, network and subscription identifiers are sent to Ola.

Use of products and services

When you access our services online, our web servers automatically create records of your visit. These records typically include IP-address, access times, the sites linked from, pages visited, the links and features used, the content viewed or requested, browser or application type, language and other such information. See also our Cookie policy.

Our applications may contact our servers periodically, for example to check for updates or to send us information relating to service usage. Additionally, we may invite you to join voluntary product and service improvement or research programs where detailed information is collected.

Information you provide us with

When you create an account, make a purchase, request services, participate in research or campaigns or otherwise interact with us, we may ask for information such as your name, email address, phone number, street address, usernames and passwords, feedback, information relating to your devices, age, gender, and language, bank account number, credit card details and other such financial information.

We also maintain records of your consents, preferences and settings relating to, for example, location data, marketing and sharing of personal data.

Your transactions with us

We maintain records of your purchases, downloads, the content you have provided us with, your requests, agreements between you and Ola, the products and services provided to you, payment and delivery details, your contacts and communications and other interactions with us. We may, in accordance with applicable law, record your communication with our customer care or with other such contact points.

Positioning and Location data

Location-based services establish location through the use of satellite, mobile, Wi-Fi, Bluetooth Low Energy ("BLE") or other network based positioning methods. These technologies may involve exchanging your location data and unique device and mobile, Wi-Fi, Bluetooth, or other network related identifiers with Ola. Our products may operate on multiple device platforms, applications and services which may also collect your location data. We do not use this information to identify you personally without your consent.

When you use our location based services and features, for example location based search, navigation and routing, or request for map data, your location data is sent to Ola to serve you with the right content, which may also include location based advertising.

Research and development- We may use personal information for research and development purposes where it is in our legitimate business interests, including to analyze and improve the Services and our business. As part of these activities, we may create or use aggregated, de-identified or other anonymized data from personal information we collect. We make personal information into anonymized data by removing information that makes the data personally identifiable to you. We may use this anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

Compliance and protection- We may use personal information to comply with legal obligations, and to defend us against legal claims or disputes, including to:

- Protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims).
- Audit our internal processes for compliance with legal and contractual requirements and internal policies.
- Enforce the terms and conditions that govern the Services.
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical, or illegal activity, including cyberattacks and identity theft.
- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

HOW INFORMATION IS PROCESSED

The information may be processed by our Website. Your Personal Information is processed by us under different circumstances and under different lawful basis. The same is provided below for your information:

- To provide, administer, maintain and/or analyze the Services;
- To improve our Services and conduct research;
- To communicate with you; including to send you information about our Services and events;
- To develop new programs and services;
- To prevent fraud, criminal activity, or misuses of our Services, and to protect the security of our IT systems, architecture, and networks;
- To carry out business transfers; and
- To comply with legal obligations and legal process and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or other third parties.

Aggregated or De-Identified Information. We may aggregate or de-identify Personal Information so that it may no longer be used to identify you and use such information to analyze the effectiveness of our Services, to improve and add features to our Services, to conduct research and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Services and share aggregated information like general user statistics with third parties, publish such aggregated information or make such aggregated information generally available. We may collect aggregated information through the Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use de-identified information in anonymous or de-identified form and we will not attempt to re-identify the information, unless required by law.

SHARING/TRANSFER OF PERSONAL DATA

We do not sell or share your personal information with third-parties for interest-based advertising purposes. We may disclose your personal information as described below:

Service providers- We may rely on third-party service providers in furtherance of the purposes described above. In these cases, personal information may be accessed by these third-parties and processed or stored on our behalf. These service providers can include hosting services, cloud computing and storage services, maintenance services, security services, and user support services. We also may share hashes of names and phone numbers and limited device data for advertising attribution and measurement services. This means that the recipient can recognize your name and phone number only if they already have that information from another source.

Affiliated- We may disclose Personal Information to our affiliates, meaning an entity that controls, is controlled by, or is under common control with Ola Maps. Our affiliates may use the Personal Information we share in a manner consistent with this Privacy Policy.

Authorities and others- If we are legally obliged or otherwise believe it necessary to do so, personal information may be disclosed to regulatory agencies, law enforcement agencies,

courts, and other government authorities, including for the compliance and protection purposes described above.

International transfers

We may transfer your Personal Data to recipients in countries outside India that may have differing data protection laws. This includes countries which may not have an adequate level of protection for Personal Data. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. We will ensure there is a legal ground for the transfer in accordance with applicable data protection legislation.

RETENTION

We will only retain your Personal Data for as long as it is necessary to fulfill the purposes outlined in this policy or the purposes of which you have otherwise been informed. This means that when you have consented to our Processing of your Personal Data, we will retain the data for as long as the active account lasts (and, where applicable, until the expiry of the warranty period) or until you withdraw your consent. If you have revoked your consent, we may nevertheless retain certain Personal Data for the period required in order for us to meet our legal obligations and defend ourselves in legal disputes. If we have not received your consent for Processing, the Personal Data will only be retained to the extent we are permitted to do so by law.

RIGHTS OF DATA PRINCIPALS

If you live anywhere in India, the law has various rights bestowed on you in relation to your personal data. We will have to confirm your identity, wherever applicable, to ensure that your rights are being exercised appropriately. To exercise these rights you will have to write to us at support@olakrutrim.com. Except in exceptional circumstances, we will respond to your request within 30 days from the date we receive your email. We may charge a minor sum to comply with your exercise of these rights to aid the cost we incur for this compliance. You will be informed of these charges once you write to us. You have the following rights under applicable laws in your country.

1. Accessing your personal information

You have the right to access a copy of your personal information that we hold in a standard form that will be easy and understandable. In rare occasions we may not provide you with a copy of your information in which case we will convey you this message with appropriate reasons. Generally, we can only deny you your right of access if it concerns the right of other individuals or we have another lawful reason to withhold that information and not otherwise. You also have the right to access in one place the identities of the data fiduciaries with whom your personal data has been shared by us together with the categories of personal data shared with them.

2. Verify and rectify

Accuracy is an important principle of data protection and you have the right to verify your information with us and ask us to rectify it if it is inaccurate. You can correct, complete and update your name, address, contact details and other personal information you give us.

3. Withdrawing your consent

You can always withdraw your consent you have given us. We will be bound to stop collecting or processing your data we collect from you solely on the basis of your consent. For instance, there are certain data points for which we take your explicit consent like GPS tracking. You

can withdraw from GPS tracking anytime by using the App. However, we will accordingly be unable to offer you other services that are dependent on GPS tracking like navigation. (other mechanisms if they exist for consent withdrawal to be mentioned)

Also, we are legally permitted to continue collecting or processing your personal data if we can rely on grounds other than consent to process your information.

4. Objecting to our use of your personal information and automated decisions made about you

You have the right to object to the processing of your data if the processing is carried out on a legal basis other than consent. But you will have to provide reasons for such withdrawal. Where your personal data is processed for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection. We will temporarily stop processing your personal data until we have assessed your concerns. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we may continue using your data.

You may at any time opt to unsubscribe from any of our optional services or make changes in the settings of the website or the application.

You may object to a decision made about you based on automated processing by contacting our data protection officer.

5. Erasing your personal information

You have the right to get your information erased from our systems. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

6. Your right to port your data

You have the right to ask for a copy of information that we collect from you in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form.

You can also ask us to send your personal information directly to another data fiduciary, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

7. Your right to be forgotten

You may also ask us to restrict or prevent processing your personal information in the following situations:

Where you believe it is unlawful for us to do so, you have objected to its use or withdrawn your consent and our assessment is pending or where your data has served the purpose.

In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

LODGING OF COMPLAINT

If you have any issues with the way we process data or you need any clarification on our privacy practices you can always contact our Data Protection Officer at support@olakrutrim.com. Your issues will be addressed by us as soon as possible and within a maximum period of one month.

However, if you are still of the opinion that we are processing your personal data in violation of data protection laws and regulations you have the right to lodge a complaint with the supervisory authority.

Who is the controller of your Personal Data?

ANI Technologies Private Limited is the controller of your personal data.

In addition, the Ola's subsidiary or affiliate providing the product or service may be a controller of your personal data. You may find the identity of the controller and its contact details by reviewing the terms and conditions of such a product or service or by using contact information provided in the applicable Ola websites.

In matters pertaining to Ola's privacy practices you may contact our Grievance Officer at: support@olakrutrim.com

Changes to this Privacy Policy

Ola may from time to time change this Policy or change, modify or withdraw access to this site at any time with or without notice. However, if this Policy is changed in a material, adverse way, Ola will post a notice advising of such change at the beginning of this Policy and on this site's home page for 30 days. We recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy.