

PRIVACY POLICY – OXIGEN GROUP

The Privacy Policy covers the practices for handling and securing your Personal Information by Oxigen.

This Privacy Policy is applicable to persons who make any transaction using website, mobile site, mobile app & offline channels including retail offices.

As a user or customer of Oxigen, the person agrees with this Privacy Policy and the terms and conditions mentioned herein.

This privacy statement does not apply to the websites, mobile sites and mobile apps of our other third parties, even if their websites are linked to Oxigen's Website. We recommend you review the privacy statements of the other parties with whom you interact.

Oxigen Group comprises of Oxigen Services (India) Private Limited, Oxigen Online Services (India) Private Limited, and all its subsidiaries and affiliates.

INTRODUCTION:

We are sensitive to the scenario that We would be dealing with data and information of a personal nature. By using Our Website (www.oxigenwallet.com) and related mobile applications (also referred as "We", "Us", "Our" and "Oxigen Wallet", as the context may necessitate), You tend to provide Personal Information of You and Your family (also referred as "You", "Your", "Yours" or the "User", as the context may necessitate). You consent to the terms of Our online Privacy Policy and to Our processing of such Personal Information for the purposes explained in this policy by registering on the Website or by subscribing to Our services. You also agree to Our contacting You pursuant to the business relationship established using the information You provide to Us. We request You to read this Policy in accordance with Terms of Use and to use these to make informed decisions.

This Privacy Policy sets out how Oxigen Wallet uses and protects any information that You provide when You use Our Website for any transaction. We are committed to ensuring that information shared by You is protected and We assure You that it shall solely be used in accordance with this Privacy Policy.

1. PRIVACY

Your privacy is of utmost importance to Us. We follow systematic and stringent procedures to protect the security of the information / data shared with Us and stored on our Website. The information that You have shared on our Website is stored in secure server with encryption and can be accessed only for official purposes. Any of Our employees who violate Our privacy and/or security policies related to customer's data is subject to disciplinary action, including possible termination and civil and/or criminal prosecution.

2. REGISTRATION

Upon signing up on Our Website, You are required to provide Us with certain basic mandatory information inter-alia Your name, title, physical address, phone number, e-mail address, details regarding Your credit/debit Card and other sensitive information. We never request more information than is reasonably necessary to provide requested services. We assume all the information provided by You is true, accurate, current, non-misleading, consistent and relevant. Once the registration process is completed, the said e-mail id and password can be used to access Your account every time You visit Our Website.

3. INFORMATION THAT WE COLLECT AND THAT YOU PROVIDE

I. PERSONAL INFORMATION

Personal Information means and includes all information that can be linked to a specific individual or to identify any individual, such as:

- a. Your full name, address, e-mail address, telephone number, date of birth and bank or payment card details and any proof of Your identity and/or address that we may request;
- b. Details of any transactions that You carry out through our Website or application using Your Oxigen account and of the fulfilment of Your requests;
- c. Details of any credit, debit or other card used by You for transactions;
- d. Details of any bank account (including but not limited to, account holder, account name, account number, sort code, online banking PIN, Transaction Authentication Number "TAN" and password, available balance and transaction history of Your bank account), ITR, TAX certificates or any other income documents as necessary by Us;
- e. Any correspondence sent by You to Us;
- f. Survey that You complete through the Website or based on our request;
- g. Your participation in any promotion sponsored by Us;
- h. Calls that we make to You or You make to Us;
- i. Information collected through Cookies;
- j. Your IP address, log-in times, operating system and browser type;
- k. Details of Your visits to our Website/ mobile application including, but not limited to, Traffic Data, location data, weblogs and other communication data, whether this is required for Our own billing purposes or otherwise and the resources that You access whilst visiting Our Website or mobile application.

II. ANONYMOUS INFORMATION

- I. Oxigen Wallet uses Cookies to collect information for record keeping purposes and makes it easier to navigate the Website. Cookies are small text files that are stored on Users' hard drives. We will not use cookies to collect personal information without getting Your permission. We use both "session ID cookies" and "persistent cookies." Session ID cookies are used to store information while a User is logged into the site and expires when the User closes their browser. Persistent cookies are used to make tasks like logging into the site easier for returning Users by remembering a User's

login information. Persistent cookies stay on a User's hard drive from one session to the next. You may choose not to receive cookies from Us by following instructions in the website.

III. INFORMATION COLLECTED BY MERCHANTS

Oxigen Wallet shall engage independent merchants to provide certain services and products related to our Website. Access to any of Your Personal Information by these merchants is limited to the information reasonably necessary in order for the merchants to perform their limited services for Us. We also insist that these merchants protect Your Personal Information in a manner consistent with this Privacy Policy and that the merchants shall not use or disclose Your personal information for any purpose other than providing Us with the products or services for which We have contracted. We will not sell, distribute or lease Your Personal Information to merchants unless:

- a. Required by law such as to comply with a subpoena, or similar legal process. To the extent We are legally permitted to do so, We will take commercially reasonable steps to notify You in the event that We are required to provide Your personal information to Merchants as part of legal process.
- b. When We believe in good faith that disclosure is necessary to protect Our rights, protect Your safety or the safety of others, investigate fraud or respond to a written government request.
- c. If Oxigen Wallet becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, We will provide notice before personally identifying information becomes subject to a different privacy statement
- d. To any other Merchant with Your prior consent to do so.

IV. INFORMATION COLLECTED BY THIRD PARTY AD SERVERS

Third-party ad servers or ad networks may serve advertisements on the Website. These third-party ad servers or ad networks use technology to send, directly to Your browser, the advertisements and links that appear on Oxigen Wallet. They automatically receive Your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content. Oxigen Wallet does not provide any personally identifiable information to these third-party ad servers or ad networks without Your consent. However, please note that if an advertiser asks Us to show an advertisement to a certain audience or audience segment and You respond to that advertisement, the advertiser or ad-server may conclude that You fit the description of the audience they are trying to reach. You should consult the respective privacy policies of these third-party ad servers or ad networks. This Privacy Policy does not apply to, and We cannot control the activities of, such advertisers.

V. USE OF PERSONAL INFORMATION

We use personal information to provide You with services & products You explicitly requested for, like the following:

- a. To carry out Your instructions for making and receiving payments and undertake transactions using Our services, including verifying that You have sufficient funds in Your Oxigen Wallet to make such payments;
- b. To operate and administer Your Oxigen account for providing services that You have requested;
- c. To notify You about changes to Our service(s);
- d. To comply with financial services regulations including retention of financial information and transactions;
- e. For customer service, including answering questions and responding to feedback and complaints;
- f. To provide You with information, products or services that You request from Us or which We feel may interest You.
- g. To allow You to participate in interactive features of the website or mobile application;
- h. To improve Our internal customer training,
- i. For financial and identity checks, fraud prevention checks, anti-money laundering and credit checks;
- j. To enhance the security of Our services;
- k. To send You offers based on Your previous orders and interests;
- l. To complete optional online surveys which may ask You for contact information and demographic information (like zip code, age, gender).

VI. RETENTION OF DATA

Oxigen Wallet is required, under applicable laws, to retain certain records for a period as suggested by regulatory authorities even after closure of Your Oxigen Wallet account, which will include Your personal data such as Your name, contact details, customer number and transaction history, ("Retained Data"). Other than the Retained Data, We will delete and destroy all Personal Information that We hold about You when You (or we) terminate Your Oxigen account. We do not store Your online banking login PIN, TAN and/or password. Please note that we will not store Your credit card information.

Please note that we will never ask You to disclose Your personal or security details by e-mail. If You receive any e-mail purportedly from Us requesting Your personal or security details, please do not respond to it ("Such E-mail"). Please forward any Such E-mail to care@oxigenwallet.com and thereafter delete the e-mail immediately.

VII. TRANSFER OF INFORMATION

- i. We may share Your Personal Information with third parties to provide You with services that We offer through Oxigen Wallet, conduct quality assurance testing, facilitate creation of accounts, provide technical and customer support, or provide specific services, such as synchronization of Your contacts with other software applications, in accordance with Your instructions. These third parties are required not to use Your personal information other than to provide the services requested by You.
- ii. We may share Your personal information with Our subsidiaries, joint ventures, or other companies under a common control that We may have now or in the future, in which case We will require them to honour this Privacy Policy. If another company acquires Our company or Our assets, that company will possess Your personal

information, and will assume the rights and obligations with respect to that information as described in this Privacy Policy.

- iii. We may disclose Your personal information to third parties in a good faith belief that such disclosure is reasonably necessary to:
 - a. take action regarding suspected illegal activities;
 - b. enforce or apply Our Terms of Use and Privacy Policy;
 - c. comply with legal process, such as a search warrant, subpoena, statute, or court order; or
 - d. protect Our rights, reputation, and property, or that of Our users, affiliates, or the public.
- iv. We may disclose information in the aggregate to third parties relating to user behaviour in connection with actual or prospective business relationship with those third parties, such as advertisers and content distributors.

VIII. CONSEQUENCES OF NOT PROVIDING PERSONAL INFORMATION

If You choose not to provide Your Personal Information that is mandatory to process Your request, Oxigen Wallet may not be able to provide the corresponding services.

IX. SECURITY

Oxigen Wallet has drawn up stringent security measures to protect the loss, misuse, and alteration of the information provided by You under Our control. At any point of time, when You change or access Your account information, We offer the use of a secure server. Once Your information is in Our possession, We adhere to strict security guidelines, protecting the information against unauthorized access. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. For example,

- a. We use Secure Socket Layer (SSL) to encrypt the transmission of data on Our Website.
- b. We review Our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- c. We restrict access to Personal Information to Our employees, contractors and agents who need to know that information in order to process it for Us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- d. We are not responsible for third party circumvention of any privacy settings or security measures on Oxigen Wallet. You can reduce these risks by using common sense security practices such as choosing a strong password, using different passwords for different services, and using up to date antivirus software.

X. SERVER LOGS

In order to ensure easy and comfortable surfing on our Website, each time you visit our Website, the computer collects certain statistical information. These statistics are only used to provide Us information in relation to the type of User using our Website by maintaining history of page requests and at no point they identify the personal details of the User. We may make use of this data to understand as to how our Website is being used.

XI. INTERNATIONAL USERS

The Website is hosted in India. If You are accessing the Website from outside India, Your use of the Website is governed by laws of India. You are transferring Your Personal Information to India, and You consent to that transfer.

XII. OTHER INFORMATION

- i. If You would like to view the information We have collected from You or You want to correct Your information, please go to Our Login page and log into Your account to view the above details and to review Your personal information.
- ii. If You believe that any information We are holding about You is incorrect or incomplete, please email Us at Care.level2@myoxygen.com
- iii. We will promptly correct any information found to be incorrect.
- iv. We may change this policy from time to time by updating this page. We will post a notice on Our home page that this Privacy Policy has changed.
- v. Unless stated otherwise, Our current Privacy Policy applies to all information that We have about You and Your account.
- vi. This policy is effective from the date last updated.

XIII. CONSENT

You consent to the collection and use of the information You disclose on Oxigen Wallet in accordance with this Privacy Policy, by using Oxigen Wallet and/or by providing Your information, including but not limited to Your consent, for sharing Your information as per this Privacy Policy.

Oxigen may also contact the You by voice call, SMS or email to know the preference of the User for concluding any transaction or related activity. You hereby unconditionally consent that such communications via SMS and/ or voice call by Oxigen is (a) upon the request and authorization of the User, (b) 'transactional' and not an 'unsolicited commercial communication' as per the guidelines of Telecom Regulation Authority of India (TRAI) and (c) in compliance with the relevant guidelines of TRAI or such other authority in India and abroad. You will indemnify Oxigen against all types of losses and damages incurred by Oxigen due to any action taken by TRAI, Access Providers (as per TRAI regulations) or any other authority due to any erroneous complaint raised by You on Oxigen with respect to the intimations mentioned above or due to a wrong number or email id being provided by you for any reason whatsoever.

In the event you wish to opt out from receiving any SMS or email, you may write to the Grievance Officer are provided below:

Shashank Gupta

Email Id: Nodal@myoxygen.com

Care.level2@myoxygen.com

XIV. UPDATES TO PRIVACY POLICY

Our Privacy Policy may change at any time without prior notification. To make sure that You are aware of any changes, kindly review the policy periodically. This Privacy Policy shall apply uniformly to Oxigen Wallet's desktop website & mobile applications.

XV. ENFORCEMENT

We may use the information collected, in connection with Your use of Oxigen Wallet (including Your personal information) in order to investigate, enforce, and apply our Terms of Use and Privacy Policy.

XVI. DISPUTE RESOLUTION

If You believe that Oxigen Wallet has not adhered to this Privacy Policy please email to Us at E-mail: Care.level2@myoxigen.com

(In Your email, please describe in as much detail as possible ways in which You believe the Privacy Policy has not been complied with. We will investigate Your complaint promptly.)

YOUR USE OF THE WEBSITE CONFIRMS YOUR AGREEMENT TO THE PRIVACY POLICY.

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