

# Data Privacy Policy

Idea Mobile Commerce Services Ltd, hereafter referred as (IMCSL) recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with the IMCSL. Keeping personal information of customers secure and using it solely for activities related to the IMCSL and preventing any misuse thereof is a top priority of the IMCSL.

In this Policy, personal information means any information that relates to a natural person, which either directly or indirectly, in combination with other information available or likely to be available with IMCSL, is capable of identifying such person.

This Privacy Policy explains the collection, use, protection, disclosure, sharing and transfer, if any, of “personal information” by IMCSL. IMCSL reserves its right to edit/ amend this privacy policy from time to time and the same shall be updated on the website.

## Applicability

This Policy is applicable to personal information collected by IMCSL directly from the customer or through IMCSL online portals, mobile application and other electronic communications as also any information collected by IMCSL’s server from the customer’s browser.

## Information

IMCSL collects, retains and uses personal information only when it reasonably believes that it is for a lawful purpose and that it will help administer its business or provide products, services, and other opportunities to the visitor / customer. IMCSL collects three types of information: personal, sensitive personal data or information and non-personal.

- **Personal Information**

Any information that relates to a natural person, which, either directly or indirectly, in combination with other information available is capable of identifying such person. Information including but not limited to name, address, telephone number, e-mail, occupation, etc.

- **Sensitive Personal Data or Information**

Sensitive personal data or information of a person means such personal information which consists of information relating to passwords, financial information such as Bank account or credit card or debit card or other payment instrument details, sexual orientation, physical physiological and mental health condition, medical records and history, biometric information, details of nominees and national identifiers including but not limited to: Aadhaar card, passport number, income, PAN, etc. For customers

enrolled in services provided by IMCSL, such as online bill payment, personal information about the transaction is collected.

Any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purpose of these rules.

The information you provide online is held by IMCSL business that maintains your account or is processing your application for a new product or service.

- **Non personal information**

This information includes the IP address of the device used to connect to IMCSL's website along with other information such as browser details, operating system used, the name of the website that redirected the visitor to IMCSL's website, etc. Also, when you browse our site or receive one of our emails, IMCSL and our affiliated companies, use cookies and/or pixel tags to collect information and store your online preferences.

### **Choice**

Consent will be obtained from you when your information is collected by IMCSL, in a manner recognized by law. Also, you will be informed of the choices you have for providing your personal information. Only information required for legal purposes or for providing services will be collected

### **Accuracy**

IMCSL has processes in place to ensure that the personal information residing with it is complete, accurate and current. If at any point of time, there is a reason to believe that personal information residing with the IMCSL is incorrect, the customer may inform IMCSL in this regard. IMCSL will correct the erroneous information as quickly as possible.

### **Purpose and Usage**

IMCSL uses the information collected and appropriately notifies you to manage its business and offer an enhanced, personalized online experience on its website. Further, it enables IMCSL to:

- Process applications, requests and transactions
- Maintain internal records as per regulatory guidelines
- Provide services to customers, including responding to customer requests
- Comply with all applicable laws and regulations
- Recognize the customer when he conducts online banking
- Understand the needs and provide relevant product and service offers

## **Disclosure / Sharing**

IMCSL does not disclose sensitive personal data or information of a customer except as directed by law or as per mandate received from the customer / applicant. No specific information about customer accounts or other personally identifiable data is shared with non-affiliated third parties unless any of the following conditions is met:

- To help complete a transaction initiated by the customer
- To perform support services through an outsourced entity provided it conforms to the Privacy Policy of the IMCSL
- The customer / applicant has specifically authorized it
- The disclosure is necessary for compliance of a legal obligation
- The information is shared with Government agencies mandated under law
- The information is shared with any third party by an order under the law

However, IMCSL shall also be entitled to disclose any of the customer's details, Payment record and any other information available with IMCSL, to any external agency for the purpose of procuring address/ credit information and / or collection of outstanding.

## **Security**

The security of personal information is a priority and is protected by maintaining physical, electronic, and procedural safeguards that meet applicable laws. Employees are trained in the proper handling of personal information. IMCSL has internal corporate policy and procedures such as Grievance Redressal, Incident Management, Third Party Management, etc., which are available to our employees on IMCSL's intranet. When other companies are used to provide services on behalf of IMCSL, it is ensured that such companies protect the confidentiality of personal information they receive in the same manner IMCSL protects.

## **Retention**

Information may be retained for a duration, required by regulatory clauses or as long as required to achieve the identified (and notified) purpose.

## **Customer Obligations**

The Customers shall not disclose to any other person, in any manner whatsoever, any information relating to IMCSL or its group companies of a confidential nature obtained in the course of availing the services through the website. Failure to comply with this obligation shall be deemed a serious breach of the terms herein and shall entitle IMCSL or its group companies to terminate the services, without prejudice to any damages, to which the customer may be entitled otherwise.

The customer shall not use IMCSL services for any purpose that might be construed as contrary or repugnant to any applicable law or for any purpose that is contrary to IMCSL policy.

Visit <http://www.ideacellular.com/idea/privacy-policy> to know about Idea Cellular Privacy Policy

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