

PRIVACY POLICY

1. GENERAL

1.1 Sugar Candy EA Private Limited (**“Sugar Candy EA”, “We”, “Our”, “Us”**) is committed to the protection of personal information provided by the users (**“You”, “Your”, “User”**) to Sugar Candy EA. You agree that Your use of Sugar Candy EA mobile application (**“App”**) implies Your consent to the collection, retention and use of Your personal information in accordance with the terms of this Privacy Policy (**“Privacy Policy”**).

1.2 This Privacy Policy is an electronic record in the form of an electronic contract formed under the information Technology Act, 2000 and the rules made thereunder and the amended provisions pertaining to electronic documents / records in various statutes as amended by the information Technology Act, 2000. This Privacy Policy does not require any physical, electronic or digital signature and is a legally binding document between You and Sugar Candy EA.

1.3 We take the privacy of Our Users seriously. We are committed to safeguarding the privacy of Our Users while providing a personalized and valuable service.

1.4 No User information is rented or sold to any third party. When You use the App, the App may collect Your device number and other personal information. A high standard of security is maintained by Us for Our Users. However, the transmission of information via the internet or telephone networks is not completely secure. While We do Our best to protect Your information, particularly with respect to protection of Your personal data, Sugar Candy EA cannot ensure the security of Your data transmitted via the internet, telephone or any other networks.

1.5 Access to the contents available through the App is conditional upon Your approval of this Privacy Policy which should be read together with the terms and conditions of use (“**Terms**”). You acknowledge that this Privacy Policy, together with our Terms, forms Our agreement with You in relation to Your use of the App (“**Agreement**”).

2. INFORMATION COLLECTED

2.1 Traffic Data Collected

In order to provide the App, We automatically track and collect the following categories of information when You use the App:

- (i) IP addresses;
- (ii) Domain servers; and
- (iii) Other information with respect to Your device, interaction of Your device with the App and applications (collectively “**Traffic Data**”).

2.2 Personal Information Collected

In order to provide the App, We may require You to provide Us with certain information that personally identifies You (“**Personal Information**“). Personal Information includes the following categories of information:

- (i) Contact data (such as Your email address, phone number and any details of Your contacts); and
- (ii) Demographic data (such as Your time zone, Your postal address and location details); and

If You communicate with Us by, for example, e-mail or letter, any information provided in such communication may be collected by Sugar Candy EA.

- (iii) Financial data (such as Your account details, e-wallet details, credit or debit card details etc. that You have provided Us for disbursement of prizes and coupons).

2.3 Our App may transmit Your Personal Information to Our internal servers. This Personal Information is immediately deleted once You delete the App, except to the extent it is necessary to store the same under applicable laws. Further, We have implemented commercially reasonable physical, managerial, operational and technical security measures to protect the loss, misuse and alteration and to preserve the security of the Personally Information in Our care. Finally, this information is used strictly in line with Our business purposes and to provide You with useful features.

2.4 Our App may contain links to third party websites or applications. You agree and understand that privacy policies of these websites are not under Our control. You understand that once You leave Our servers, use of any information You provide shall be governed by the privacy policy of the operator of the site used by You.

3. DISCLOSURE OF PERSONAL INFORMATION

3.1 We do not disclose Your Personal Information to any third parties other than to Sugar Candy EA's affiliates or other trusted business or persons, based on strict adherence and in compliance with Our Privacy Policy and any other appropriate confidentiality and security measures.

3.2 We use Our best efforts to use information in aggregate form (so that no individual User is identified) for the following purposes:

3.2.1 To build up marketing profiles;

3.2.2 To aid strategic development, data collection and business analytics;

3.2.3 To provide seamless and swift delivery of prizes and coupons to You;

3.2.4 To manage Our relationship with advertisers and partners;

3.2.5 To audit usage of the App; and

3.2.6 To enhance User experience in relation to the App (“collectively, “Permitted Use”).

3.3 We reserve the right to disclose Personal Information if required to do so by law or if We believe that it is necessary to do so to protect and defend the rights, property or personal safety of Sugar Candy EA, the App, or Our Users.

4. CONFIDENTIALITY

4.1 Except as otherwise provided in this Privacy Policy, We will keep Your Personal Information private and will not share it with third parties, unless We believe in good faith that disclosure of Your Personal Information or any other information We collect about You is necessary for Permitted Use or to:

4.1.1 Comply with a court order or other legal process;

4.1.2 Protect the rights, property or safety of Sugar Candy EA or another party;

4.1.3 Enforce the Agreement, including Terms; or

4.1.4 Respond to claims that any posting or other content violates the rights of third-parties.

5. SECURITY

5.1 The security of Your Personal Information is important to Us. We follow generally accepted industry standards to protect the Personal Information submitted to Us, both during transmission and once We receive it. All information gathered on Our Website is securely stored within Our controlled database. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited.

5.2 Although We make best possible efforts to store Personal Information in a secure operating environment that is not open to the public, You should understand that there is no such thing as complete security, and We do not guarantee that there will be no unintended disclosures of Your Personal Information. If We become aware that Your Personal Information has been disclosed in a manner not in accordance with this Privacy Policy, We will use reasonable efforts to notify You of the nature and extent of such disclosure (to the extent We know that information) as soon as reasonably possible and as permitted by law.

6. COOKIES

6.1 To improve the responsiveness of the sites for Our Users, We may use “cookies”, or similar electronic tools to collect information to assign each visitor a unique, random number as a User Identification (User ID) to understand the User’s individual interests using the Identified Computer. Unless You voluntarily identify yourself (through registration, for example), We will have no way of knowing who You are, even if We assign a cookie to Your computer. The only personal information a cookie can contain is information You supply. A cookie cannot read data off Your hard drive. Our advertisers may also assign their own cookies to Your browser (if You click on their ads), a process that We do not control.

6.2 Our web servers automatically collect limited information about Your computer’s connection to the Internet, including Your IP address, when You visit Our site. (Your

IP address is a number that lets computers attached to the Internet know where to send You data — such as the web pages You view.) Your IP address does not identify You personally. We use this information to deliver Our web pages to You upon request, to tailor Our site to the interests of Our Users, to measure traffic within Our site and let advertisers know the geographic locations from where Our visitors come.

7. UPDATES AND CHANGES TO PRIVACY POLICY

7.1 We reserve the right, at any time, to add to, change, update, or modify this Privacy Policy so please review it frequently. If We do, then We will post these changes on this page. In all cases, use of information We collect is subject to the Privacy Policy in effect at the time such information is collected.

8. YOUR RIGHTS

8.1 You have a right to correct any errors in Your Personal Information available with Us. You may request Us in writing that We cease to use Your Personal Information.

9. RESTRICTION OF LIABILITY

9.1 Sugar Candy EA Pvt. Ltd. makes no claims, promises or guarantees about the accuracy, completeness, or adequacy of the contents available through the App and expressly disclaims liability for errors and omissions in the contents available through the App.

9.2 No warranty of any kind, implied, expressed or statutory, including but not limited to the warranties of non-infringement of third party rights, title, merchantability, fitness for a particular purpose and freedom from computer virus, is

given with respect to the contents available through the App or its links to other internet resources as may be available to You through the App.

9.3 Reference in the App to any specific commercial products, processes, or services, or the use of any trade, firm or corporation name is for the information and convenience of the public, and does not constitute endorsement, recommendation, or favouring by Sugar Candy EA.

If You have questions or concerns, feel free to email Us at support@sugarcandyea.com and we will attempt to address Your concerns.