

PRIVACY CONSENT NOTICE

Your privacy is important to us. Jetprivilege Pvt Limited (“JPPL” or “we”) takes the privacy of your information seriously. This Privacy consent describes the types of personal information we collect from you on our website including sub-domains and microsites, (collectively, the “Platform”). It also describes the purposes for which we collect that personal information, the other parties with whom we may share it and the measures we take to protect the security of your data. It also tells you about your rights and choices with respect to your personal information, and how you can contact us about our privacy practices.

By signing off this agreement, using the Platform and availing the services, and voluntarily providing us with information, you are consenting to our use of it in accordance with this Privacy Notice. This Privacy Notice does not apply to third-party links, applications or websites that are connected via links to the Platform or displayed on the Platform. If you use the services of JPPL on behalf of someone else (such as your family members, friend or any other related person) or an entity (such as your employer), you represent and warrant that you are authorised by such individual or entity to (i) accept this Privacy Notice on such individual’s or entity’s behalf, and (ii) consent on behalf of such individual or entity to our collection, use and disclosure of such individual’s or entity’s information as described in this Privacy Notice. You indemnify JPPL from any claims which such individual or entity may claim against JPPL.

This Privacy Note constitutes a legal agreement between you, as a user of the Platform and us, as the owner of the Platform. You must be a natural person who is at least 18 years of age.

You are advised to carefully read this Privacy Notice before using or availing any of our products and/or services.

DEFINITIONS

In this Privacy Notice, the following definitions are used:

Data

Includes non-personal information, personal information and sensitive personal information about you, which either directly or indirectly in combination with other information, could allow you to be identified when you visit our Platform.

This includes, without limitation, the following categories:

Personal information: means and includes any information that relates to a natural person through which an individual is identified, such as the first and last name, email address, postal address, country, employer, phone number, gender, age or any other relevant material provided by you; including but not limited to information gathered through a purchase of a service, survey, e-mail

updates. This may also include information regarding the family member, relative, partner, friend or any person related to you in any way as provided by you through the Platform.

Technical information: means and includes any information gathered through various technologies that may employ web beacons, or similar technologies to automatically record certain information from your device through which you use the Platform. This technical information may include website, device and mobile app usage, device or browser type, advertising ID, Internet Protocol (IP) address, referring or exit pages, clickstream data, operating system, user statistics and similar information collected via automated means, such as cookies, pixels and similar technologies.

Product and service information: means and includes any information relating to registration and payment information, and program-specific information, when you request products and/or services directly from us, or participate in marketing programs.

Data Protection Laws

Any applicable law for the time being in force relating to the processing of Data including the Digital Personal Data Protection Act 2023 and the Information Technology Act, 2000, as amended or substituted;

Partners

Selected third parties or partners with whom we have contracts for the businesses as listed below; we ensure such partners respect the security of your Data and to treat it in accordance with this Privacy Notice and applicable laws;

Service Providers

Includes entities to whom we will disclose your Data in order to process information on our behalf for a specific purpose pursuant to written contract; such entity shall have access to Data needed to perform its functions but may not use it for other purposes;

User or you

The natural person who accesses the Platform.

SCOPE

JPLP collects Data to operate this Platform. You provide some of this Data directly, such as when you access our Platform or avail our services. You provide some of this Data when you complete registration forms of our partners; or such other manner specified on this Platform.

You can make choices about our collection and use of your Data. For example, you may want to access, edit or remove your Data on the Platform. When you are asked to provide Data, you may decline. Provision of editing and deletion of data shall be available on our website for your perusal.

Your consent:

Please note that by providing the information you provide your consent and authorize us to collect, use or disclose such information for the purposes stated in this Privacy Notice, the Terms of Use, and as permitted or required by applicable law.

HOW WE COLLECT DATA

We collect Data in the following ways:

Information You Give Us:We receive and store any information you enter on our Platform or give us in any other way, such as through other Partners or via emails. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features.

Automatic Information We Collect:We use “cookies”, pixels and similar technologies to receive and store certain types of Technical Information whenever you interact with us.

E-mail Communications:To help us make e-mails more useful and interesting, we often receive a confirmation (if your device supports such capabilities) when you open e-mail from us or on a link in the e-mail. You can choose not to receive marketing emails from us by clicking on the unsubscribe link in any marketing email.

Automatic Information We Collect from Other Websites:We receive and store certain types of information when you interact with third-party websites that use our technology or with whom we have a specific agreement. Because we process this information on behalf of the applicable website operators, collection, processing, and use of such information is subject to the applicable website operators’ privacy policies and is not covered by our Privacy Notice.

Information from Other Sources: An example of information we might receive from other sources is when you authorize a third-party website (such as the website of another listed partners), to interact directly with our Platform to provide or receive Data about you. In that case, we might receive such Data used by that third-party website to identify your account with that website.

DATA SHARED BY YOU

JPLL may collect your Data in several ways from your use of this Platform. For instance:

- When you register with us on this Platform to receive our products and/or services;
- When you complete surveys conducted by or for us;
- When you elect to receive any communications (including promotional offers) from us;
- From the information gathered by your visit to our Platform;
- Information provided by you (such as to answer your queries, support and contact requests, subscribing to our newsletters etc)..

DATA THAT IS COLLECTED AUTOMATICALLY

We automatically collect some information when you visit our Platform. This information helps us to make improvements to our content and navigation. The information collected automatically includes your IP address.

Our web servers or affiliates who provide analytics and performance enhancement services collect IP address, operating system details, browsing details, device details and language settings.

We may collect your Data automatically via cookies, pixels and similar technologies in line with settings on your browser.

OUR USE OF DATA

Any or all the above Data may be required by us from time to time to provide information relating to JPPL and to work on the experience when using our Platform. Specifically, Data may be used by us for the following reasons:

We collect identity verification data to authenticate the submissions made by you on the Platform.

Provide products and/or services and communicate with you about products and/or services offered by us; provide you with offers, personalized services and recommendations and improve your experience on this Platform; generate aggregated data to prepare insights to enable us to understand patterns and trends with a view to learn more about your preferences or other characteristics; responding to your requests, customizing and improving our services and communicating with you.

Protect against and prevent fraud and other legal or information security risks to ensure continued service for you; to enable our group entities to reach out to you in relation to their programs managed by them / products or services offered by them; Serve other purposes for which we provide specific notice at the time of collection, and as otherwise authorized or required by applicable law.

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights and choices" below).

We may use your Data to show you adverts and other content on other websites. If you do not want us to use your data to show you adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies, pixels and similar technologies" below).

We use Data to protect the security and safety of our Platform.

Additionally, to improve your experience of the Platform, we collect the following data:

Increase output: JPPL uses all this information to analyze the usage trends, learning behaviours and preferences of the users, to improve the way these services work and look with respect to you, including updating, enhancing the operations and functionality of these features.

Business or Research Purposes: The information is used for business or research purposes, including improving and customizing the Platform for ease of use and the products and services offered by us. We may archive this information to use it for future communications for providing updates and/or surveys.

Improve functionality: All information is used to provide a personalized learning and high-quality experience for our users by increasing site functionality and the services offered by JPPL.

We treat these inferences as personal information (or sensitive personal information, as the case may be), where required under applicable law.

MINORS

The Platform does not offer products or services for use by minors. If you are under 18, it is mandatory that your parent or guardian has read and accepted this Privacy Notice on your behalf, and in such a case this Privacy Notice shall be deemed to be a contract between JPPL and your legal guardian or parent and to the extent permissible under applicable laws, enforceable against you.

SHARING OF DATA

We may share your Data with/ for:

Partners: We may provide you the services through our Partners and will share your information with them so that they provide their services effectively and smoothly.

Service Providers: We may share your Data with Service Providers. Examples include storing and analyzing Data, protecting and securing our systems, providing customer service, user analysis and payment processing. We require these Service Providers to only process Data securely and in accordance with express instructions and as necessary to perform services for purposes set forth in this Privacy Notice.

When JPPL acts as a Service Provider: When we act as a service provider for Partners and provide them with Data that we process on their behalf.

Protecting JPPL: We may release Data when we believe release is appropriate to comply with applicable law or legal process, enforce or apply our Terms of Use and other agreements, prevent JPPL against harm or financial loss, when we believe disclosure is necessary to protect individuals' vital interests, or in connection with an investigation of suspected or actual fraudulent or illegal activity. This may include exchanging information with other companies and organizations for fraud protection, risk management and dispute resolution. This does not include selling or otherwise disclosing personally identifiable information from users for commercial purposes in violation of this Privacy Notice.

Business Transfers: As we continue to develop our business, we might sell or buy subsidiaries or business units. In such transactions, user information generally is one of the transferred business assets.

Third Parties: We do not share sensitive personal data with all third parties. However, this may happen if:

- You request or authorize us to do so;
- We need to comply with applicable law or respond to valid legal process; or
- We need to operate and maintain the security of this Platform, including to prevent or stop an attack on our computer systems or networks.

Please note that Service providers and Partners may have privacy practices that differ from those of JPPL. Your data will be governed by their privacy statements when you provide Data on their websites.

WE SHARE WITH YOUR SENSITIVE PERSONAL DATA WITH OUR PARTNERS AND GOVERNMENT AGENCY FOR PROCESSING OF THE SAMPLES OR COMPLIANCE UNDER APPLICABLE LAWS. YOU HEREBY PROVIDE YOUR CONSENT TO JPPL TO SHARE YOUR SENSITIVE PERSONAL DATA WITH SUCH PARTNERS AND GOVERNMENT AGENCIES.

RETENTION OF DATA

JPPL retains Data for as long as necessary to provide the access to and use of the Platform, or for other essential purposes such as complying with our legal obligations, resolving disputes, enforcing our agreements and as long as processing and retaining your Data is necessary for our legitimate interests. Because these needs can vary for different data types and purposes, actual retention periods can vary significantly.

We will delete information based on a request received from you within a reasonable period of receiving a deletion request. Even if we delete your Data, it may persist on backup or archival media for audit, legal, tax or regulatory purposes. In some circumstances, we may anonymize your Data so that it can no longer be associated with you, in which case we may use such Data without further notice to you.

YOUR RIGHTS AND CHOICES

When we process Data about you, we do so with your consent and/or as necessary to operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfil other legitimate interests of JPPL as described in this Privacy Notice.

We may transfer Data we collect about you to recipients in India, where we are headquartered. India may not have the same data protection laws as the country in which you initially provided the information. When we transfer your Data to India, we will protect that information as described in this Privacy Notice, as disclosed to you at the time of data collection or as described in our program-specific privacy notice.

Depending on which country's laws are applicable to you, you may have the right or choice to:

- Opt out of some collection or uses of your Data, including the use of cookies, pixels and similar technologies and the use of your Data for marketing purposes.
- Access your Data, rectify it, restrict or object to its processing, or request its deletion or anonymization.
- Receive the Data you provided to us to transmit it to another company.
- Withdraw any consent provided.
- Object to or restrict any form of processing you may not be comfortable with.
- Where applicable, lodge a complaint with your supervisory authority.

You may submit a request as described in the “• How to Contact Us” section below.

Below, you will find additional privacy information that you may find important. Data Protection Laws, depending on your country, may include the following rights in relation to your Data:

1. Right to confirmation and access - the right to confirm our methods of processing and request

2. Copies of the information we hold about you at any time, or
3. That we modify, update or delete such information. If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is manifestly unfounded or excessive. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
4. Right to correction - the right to have your Data rectified if it is inaccurate or incomplete.
5. Right to be forgotten- the right to request that we delete or remove your Data from our systems.
6. Right to restrict/object our use of your Data - the right to limit the way in which we can use it.
7. Right to data portability - the right to request that we move, copy or transfer your Data.
8. Right to withdraw consent – the right to withdraw your consent provided earlier.
9. Right to file complaints – the right to raise complaints to a regulatory authority.

For information about managing your Data and promotional communications, please e-mail us at dpo@jetprivilege.com.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold it.

INFORMATION SECURITY

To protect your privacy and security, JPPL takes steps to verify your identity before granting you account access or making corrections to your information.

JPPL is committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data from unauthorized access, use or disclosure. However, as effective as these measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the internet. You accept the inherent security implications of data transmission over the internet and the world wide web cannot always be guaranteed as complete secure. Therefore, your use of the Platform will be at your own risk. If you have any concerns, please feel free to email us at dpo@jetprivilege.com.

WHERE WE STORE DATA

Data collected under this Privacy Notice is hosted on servers located in India. We take steps to ensure that the Data we collect under this Privacy Notice is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located.

PROCESSING YOUR DATA

We take steps to ensure that the Data we collect under this Privacy Notice is processed according to the provisions of this Privacy Notice and the requirements of applicable law wherever the Data is located.

LINKS TO OTHER WEBSITES

This Platform may, from time to time, provide links to websites and applications of Partners whose privacy practices differ from those of JPPL. We have no control over such websites and applications and are not responsible for the content of those websites and applications. If you provide personal information to any of those websites or applications, then your data is governed by their privacy notices.

This Privacy Notice applies to the JPPL Platform only.

COOKIES, PIXELS AND SIMILAR TECHNOLOGIES

This Platform may place and access certain cookies on your device. cookies are unique identifiers that we transfer to your device to enable our systems to recognize your device. We also use Technical Information, pixels and similar technologies to analyse traffic on our Platform, to improve your experience of using the Platform.

You can choose to enable or disable cookies in your internet browser. By default, most internet browsers accept cookies, but this can be changed. For further details, please consult the help menu in your internet browser. You can choose to delete cookies at any time, however, you may lose any information that enables you to access the Platform more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

JPPL uses cookies and similar technologies for several purposes, which may include:

Storing your Preferences and Settings- Settings that enable our Platform to operate correctly or that maintain your preferences over time may be stored on your device.

Security- We use cookies to detect fraud and abuse of our websites and services.

This Platform may place the following cookies:

Type of Cookie: Persistent Cookies

Purpose: This cookie is necessary to display content in expand / collapse format on pages.

SEVERABILITY

If any court or competent authority finds that any provision of this Privacy Notice (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Notice will not be affected.

CHANGES TO THIS PRIVACY NOTICE

Our business changes constantly and our Privacy Notice will change also. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our Platform frequently to see recent changes. The updated version will be effective as soon as it is accessible. Any changes will be immediately posted on the Platform, and you are deemed to have accepted the terms of the updated Privacy Notice on your first use of the Platform following the alterations. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

HOW TO CONTACT US

To request to review, update, or delete your personal information or to otherwise reach us, please submit a request by e-mailing us at dpo@jetprivilege.com. You may contact us for information on Service Providers and Partners with whom we may share your Data in compliance with this Privacy Notice and applicable law. We will respond to your request within 30 days.

GOVERNING LAWS AND JURISDICTION

This Privacy Notice, our services, and the use of it is governed by the laws of India and the courts in Mumbai, Maharashtra shall have exclusive jurisdiction over any disputes connected to our Platform or the services.

DISCREPANCIES AND GRIEVANCES WITH JPPL:

In case of any discrepancy or grievance with respect to all or any information shared with the Company, please feel free to contact at the details shared below.

We assure you that we shall ensure implementation of this Privacy Notice and shall make the Notice available to individuals and redress the grievances of the user expeditiously within month from the date of receipt of grievance.

Name of the Grievance Officer: Mr. Hemant Kumar

Email ID: Hemant.kumar@jetprivilege.com.

Contact Us

Registered address:

B wing 703, Kanakia Wall Street, Andheri Kurla Road
Andheri East, Mumbai, Mumbai Suburban,
Maharashtra - 400099