

THIS PRIVACY POLICY IS PUBLISHED AND SHALL BE CONSTRUED IN ACCORDANCE WITH THE TERMS OF USE OF THE MEMBERSHIP AND IS TO BE READ ALONG WITH THE SAME, AND ANY ACCEPTANCE OF THE TERMS OF USE OF THE MEMBERSHIP SHALL INCLUDE AN ACCEPTANCE OF THIS PRIVACY POLICY AND THE CONSENT OF THE USER TO USE ANY INFORMATION PROVIDED BY THE USER IN ACCORDANCE WITH THE TERMS HEREOF.

All capitalized terms used herein shall have the meaning ascribed to them in the Terms of Use of the Membership. ProEdge Loyalty and Marketing is committed to protecting your privacy! We value the trust you place in us. This policy describes how we collect, use and disclose your personal information in connection with our membership services. This policy may be revised from time to time. Your continued use of the membership following such notification shall constitute your acceptance of the revised policy. We encourage you to periodically review this page for the latest information on our privacy practices.

## Personal Information

When you enroll for the membership, we may ask for information including but not limited to your age, gender, first and last name, zip code / pin code, country, occupation, industry, personal interests, company or any other physical address, contact number, email or other contact information and other relevant data.

## Personal Information and its usage

We may use your Personal Information to:

- Send you, from time to time, updates, offers, promotions, updates, news or information, regarding your memberships and respective rewards, deals and coupons, messages and other relevant information as communicated by the merchants of which you are a member, via push notifications / SMS / Call and/or email.
- Respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
- To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the terms and conditions of use of the membership or as otherwise required by law.
- Transfer information about you if we are acquired by or merged with another company or other juristic entity. In this event, we may notify you before your information is transferred and becomes subject to a different privacy policy.
- Seek your feedback or to contact you in relation to services offered on the membership.
- Administer or otherwise carry out our obligations in relation to any agreement you have with us.
- Allow you to subscribe to our newsletters.
- Allow you to enter promotions or sweepstakes.
- For such other purposes as may be intimated to you from time to time.
- All other purposes incidental, associated with or relating to the above and any other purpose which we may, from time to time, intimate you of.

We may also use Personal Information for historical, statistical or scientific purposes, while ensuring that such data cannot be used to identify the person (you) in question.

We may disclose your contact details to certain service providers to enable you to avail of some of our services. For example, we may share your mobile number with a third party to generate an OTP (a one time password) to use your membership features.

## Authorization

You authorize us to exchange, share, part with all information (personal and non-personal), across borders and from your country and jurisdiction to any other countries and jurisdictions across the world, with any agent/third party service provider/banks/financial institutions/credit bureaus/agencies/participation in any telecommunication or electronic clearing network as may be required by law, customary practice, credit reporting, statistical analysis and credit scoring, verification or risk management and shall not hold us liable for such use or disclosure of this information.

## Cookies and Tracking Devices

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We use both session ID cookies and persistent cookies on our App/Website. We use session cookies to make it easier for you to navigate the App/Website.

The use of cookies by our partners, affiliates, tracking utility company and service providers is not covered by our privacy policy. We do not have access or control over these cookies and disclaim any responsibility for the collection and use of any information by such persons or entities. Our partners, affiliates, tracking utility company and service providers may use session ID cookies to make it easier for you to navigate or sign-in to the App/Website.

## Service Providers

We use the services of various third party companies and contractors (referred to here as "Service Providers") in the conduct of our business. These Service Providers provide us with payment processing services, information technology services for our software applications, marketing and survey services, data back-up, generating one time passwords and other essential services. These Service Providers may, from time to time, collect, use, store, disclose and process Personal Information on our behalf only as necessary to provide services to us and you. We take all reasonable measures and precautions to protect your Personal Information when it is being handled by our Service Providers. If you wish to obtain more information on our use of Service Providers and our policies and practices regarding such Service Providers, please contact us as set forth below.

## Data Security

To protect against the loss, misuse and alteration of the information under our control, we have in place appropriate physical, electronic and managerial procedures. We follow generally accepted industry standards to protect the Personal Information, including mobile number, email address and other data related to your various memberships and reward programs / companies, submitted to us, both during transmission and once we receive it.

While we take steps to protect your Personal Information and keep it secure, we cannot absolutely guarantee the security of any information you transmit to us, and it is important that you understand that no website or database is completely secure or "hacker proof". If you believe the security of your account has been breached, please contact us immediately. By using our App/Website, you agree that we will have no liability for inadvertent disclosure of your information and/or its subsequent use due to errors in transmission or unauthorized acts of third parties.

## Law & Order

We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to: (a) comply with any laws; (b) to protect any person from injury; (c) to prevent fraud or abuse of our name, brands, trademarks or such other rights belonging to us or our other users; and (d) to prevent any breach or non-compliance with any law.

We may also disclose the information provided by you, without any prior consent from you, to any government agency, judicial body or government authority if requested to do so.

## Internal Usage

We may share your information with our directors, business partners, shareholders, associates, employees and staff members in connection with our products and services or the operations of our business.

## Sweepstakes, Contests, Promotions and Surveys

From time to time, we may offer you the opportunity to participate in sweepstakes, contests, surveys and other promotions. Any information submitted in connection with such activities will be treated in accordance with this policy, except as specifically set forth in the rules, terms or conditions for those sweepstakes, contests, surveys or promotions.

## Data Retention

We will retain your Personal Information for as long as your membership is active or as needed to provide you services or to retain back-up/archives and for a period of 1 year thereafter. If you wish to cancel your account or request that we no longer use your information to provide you services contact us on the contact details provided herein or. We will retain and use your Personal Information after closure of your account as necessary to meet legal, regulatory, insurance and audit requirements.

By enrolling for any memberships operated by us, you will automatically be added as a subscriber of our newsletter(s) and will receive the same on a period basis. We will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, by accessing the email preferences in your account settings page or by contacting us.

## Consent

By using our membership/s downloading and/or accessing the App/Website of memberships on your smartphone/tablet, you hereby consent to the collection and use of such information for the purposes disclosed in this Policy and the terms and conditions of usage.

You always have the option to not provide or withdraw information by choosing appropriate options/choices available in the privacy section of our products and services; however, please note that by virtue of you not providing a particular information or withdrawing any information, we shall be entitled to discontinue your use of a particular service or feature on our products and services. Such discontinuation, however, would not result in the cancellation of your account in its entirety.

## Contact

We will address any questions, comments and concerns about our online privacy practice and policy. However, should you have any grievances regarding this Privacy Policy and/or our usage of your Personal Information, you may write to our Grievance Officer on [privacypolicy@proedge-lm.com](mailto:privacypolicy@proedge-lm.com)