

## PRIVACY POLICY

### 1. INTRODUCTION

- 1.1 <https://nonucare.com> - Nonu (“**We**”, “**Our**” or the “**Company**”) is an entity registered in the city of Hyderabad of state Telangana, engaged in the business, inter alia, of health & wellness (the “**Services**”). Any person who wishes to procure the Services (the “**User**”, “**Your**” or “**You**”) may access our website (the “**Website**”) at <https://nonucare.com> and, subject to submission of the required documents, fulfilment of certain criteria and provision of information which may include Personal Information (defined in paragraph 2.3 of this Privacy Policy), the User can obtain use of the Services from the Website.
- 1.2 The Company is committed to ensuring that the privacy of its clients, visitors, and Users of the Website is always respected. This Privacy Policy serves as a testament to our sincere efforts to uphold privacy laws. The User’s privacy and the protection of the User’s personally identifiable information (“**Personal Information**”) is one of our top priorities. We assure the User that we follow appropriate and necessary standards when it comes to protecting the User’s privacy. This Privacy Policy discloses and explains how we collect, use, share and protect Personal Information, Usage Information (defined in paragraph 4.1 of this Privacy Policy) or any other information about the Users. In this Privacy Policy, We also provide information regarding how You can access and update Your Personal Information and make certain choices about how Your Personal Information is used by us. This Privacy Policy is available for direct access on our website at <https://nonucare.com/privacy-policy>.
- 1.3 This Privacy Policy explains what information will be collected by the Company when You access the Website, how the information will be used, and how You can control the collection, correction and/or deletion of information. We will not use or share Your information with anyone except as described in this Privacy Policy. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources. The use of information collected through our Website shall be limited to the purposes under this Privacy Policy and our Terms of Use [<https://nonucare.com/terms-and-conditions>] to customers.
- 1.4 BY CONFIRMING THAT YOU ARE BOUND BY THIS PRIVACY POLICY (BY THE MEANS PROVIDED ON THIS WEBSITE), BY USING THE SERVICES OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU AGREE TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO OUR COLLECTION, USE AND SHARING OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE ANY OF THE SERVICES OR GIVE US ANY OF YOUR INFORMATION. IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY (SUCH AS YOUR EMPLOYER), YOU REPRESENT

THAT YOU ARE AUTHORISED BY SUCH INDIVIDUAL OR ENTITY TO ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL'S OR ENTITY'S BEHALF.

## 2. INFORMATION COLLECTED BY THE COMPANY

2.1 In accordance with applicable laws and regulations, the Company controls, collects, owns and directs the use of the Personal Information and Usage Information. The Company is a registered company in the city of Hyderabad of state Telangana with its registered office at 1-1-719/2&3, Near Narmada Hospital, Gandhi Nagar, Hyderabad - 500080, Telangana. For any queries regarding this Privacy Policy and the collection and use of data collected or processed under this Privacy Policy, the Company can be contacted by mail at 1-1-719/2&3, Near Narmada Hospital, Gandhi Nagar, Hyderabad - 500080, Telangana; by phone at +91-9849269001 or by e-mail at [hello@nonucare.com](mailto:hello@nonucare.com). For the sake of clarity, the Company collects the following information:

- (a) contact data (such as your email address, photographs and phone number);
- (b) demographic data (such as your gender, your date of birth and your pin code);
- (c) data regarding your usage of the services and history of the appointments and prescriptions made by or with you through the use of Services;
- (d) financial data;
- (e) medical data
- (f) insurance data (such as your insurance carrier and insurance plan); and
- (g) other information that you voluntarily choose to provide to us (such as information shared by you with us through emails or letters.)

2.2 The legal basis for collection and processing of any information collected and processed by Us is (i) for the performance of the Services in accordance with Our Terms of Use; and (ii) where it is Our legitimate interests to do so and not overridden by Your rights (for example, in some cases for direct marketing, fraud prevention, network and information systems security, for responding to Your communications, the operation of networks of groups by the network administrators, and improving our Website). In some cases, we may also have a legal obligation to collect information about You, or may otherwise need the information to protect Your vital interests or those of another person, or where we need to comply with a legal requirement.

2.3 We may ask You to provide Us with certain categories of information such as Personal Information, which is information that could reasonably be used to identify You personally, such as *inter alia*, Your name, email address, mobile number, gender, date of birth, age, address, PIN code, credit card or debit card or mobile wallet details, medical records and history, biometric information, Password and IP address (“**Personal Information**”). We may collect this

information through various forms and in various places such as Our Website, including when You access the Website, when You first register with Us, when You create a transaction, when You contact Us, when You update Your information or when You otherwise interact with Us, by, for example, way of telephone, letter or in person.

- 2.4 The Company does not control or endorse the content, messages or information found in any Services and, therefore, the Company specifically disclaims any liability with regard to the Services and any actions resulting from your participation in any Services, and you agree that you waive any claims against the Company relating to same, and to the extent such waiver may be ineffective, you agree to release any claims against the Company relating to same.

### **3. COOKIES**

- 3.1 We may use a standard “cookie” browser application feature to collect and understand website usability trends and thus provide our Users with better service through customized information. Cookies are text files that may be placed on Your computer browser to store Your preferences. Cookies are used to record various aspects of Your visit and assist us in providing You with uninterrupted service. One of the primary purposes of cookies is to store Your preferences and other information on Your computer in order to save You time by eliminating the need to repeatedly enter the same information and to display Your personalized content. However, no Personal Information identifying the User is collected nor any data capture mechanisms is employed. You may change Your browser settings to accept or reject cookies on personal preference. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but You can modify the browser setting to decline cookies if You so prefer. If You choose to decline cookies, You may not be able to sign in or use other interactive features of the Website that may depend on cookies. If You choose to accept cookies, You also have the ability to later delete cookies that You have accepted. If You choose to delete cookies, any settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.
- 3.2 We process the data collected through cookies either independently or with third party service providers, such as the practitioners registered on the Website, marketing companies who provide services for our business, entities which deliver medicines pursuant to a patient placing an order for the same on the Website or any third party who enable, assist and facilitate the provision of services by the Company, who analyzes the data collected through cookies pursuant to contractual relationships with Us. The processing of such data is done to analyze the pages a User visits on the Website, which websites a User has visited before coming to the Website, and where a User goes after leaving the Website. The Usage Information and/or the Personal Information may be combined for marketing and for market research purposes, including internal demographic studies, so that we can optimize our products and Services and customize the Website for You and for the purpose of providing Our Services.

- 3.3 We may combine Usage Information or other information collected through cookies, web beacons and other technical methods with Personal Information in order to understand and improve Your online experiences and to determine what products, promotions and Services You prefer, or are likely to be of interest to You. We also use these technical methods in HTML e-mails that we send to You for a number of purposes including: to determine whether You have opened or forwarded those e-mails and/or clicked on links in those e-mails; to customize the display of the banner advertisements and other messages after You have closed an email; and to determine whether You have made an enquiry or purchase in response to a particular email.

#### **4. INFORMATION COLLECTED AUTOMATICALLY**

- 4.1 In addition to any Personal Information or other information that You choose to submit to us, we may use a variety of technologies that automatically (or passively) collect certain information whenever You access the Website (“**Usage Information**”). This Usage Information may include the browser that You are using, the URL that referred You to the Website and information regarding the devices used by You to access the Website, among other information. Usage Information may be non-identifying or may be associated with You. Whenever we associate Usage Information or a device identifier with Your Personal Information, we will treat it as Personal Information and the conditions relating to Personal Information under this Privacy Policy will be followed. Traffic data, while anonymous, is gathered and analyzed for business needs. Further, a User accessing the Website may get cookies from our advertisers. We do not control these cookies, and once a User has clicked on the advertisement and left our Website, this Privacy Policy no longer applies and shall be governed by the Privacy Policy of such advertiser.

#### **5. INFORMATION THIRD PARTIES PROVIDE**

- 5.1 We may, from time to time, supplement the information we collect about You through our Website with outside records from third parties, such as marketing or data sourcing agencies, obtained rightfully and legitimately in order to enhance our ability to serve You, to tailor our content to You and to offer You opportunities to use such of our Services that we believe may be of interest to You. We may combine the information received from such third party sources with information collected through the Website or through independent research conducted by Us with Your consent. In these cases, we will apply this Privacy Policy to any Personal Information received, unless otherwise provided. We may process such information received from third parties for legitimate commercial purposes or to enter into contractual obligations with You or in order to fulfil certain contractual obligations or where You have requested third parties to provide information about Yourself to us.

## **6. PROCESSING OF THE DATA**

- 6.1 We, our affiliates or third party service providers including the practitioners with whom we have entered into contractual arrangements may also process any Personal Information or Usage Information collected from You for legitimate commercial purposes including providing the Services. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk of our processing of Personal Information such as (i) only sharing and providing access to Personal Information to the minimum extent necessary, subject to appropriate contractual restrictions including confidentiality restrictions where appropriate, and on an anonymized basis wherever possible; (ii) using secure servers to store Personal Information; (iii) verifying the identity of any individual who requests access to Personal Information prior to granting them access to such information; and (iv) using Secure Sockets Layer (SSL) software or other similar encryption technologies to encrypt any payment transactions You make on or via our website.
- 6.2 Our third party service providers may include the practitioners registered on the Website, marketing companies who provide services for our business, entities which deliver medicines pursuant to a patient placing an order for the same on the Website, payment gateways or any third party who enable, assist and facilitate the provision of services by the Company

## **7. RIGHTS OF THE USER REGARDING THE DATA SUBMITTED**

- 7.1 Any User who has submitted Personal Information on the Website has the right to
- (i) be informed about the Personal Information We collect from You and use;
  - (ii) obtain confirmation from Us that Your Personal Information is being collected and used by Us and to access the Personal Information held about You by Us;
  - (iii) have Your Personal Information corrected if it is inaccurate or incomplete at any time;
  - (iv) erasure, or the right to be forgotten, which means You can request the deletion or removal of any Personal Information We hold about You at any time;
  - (v) block or suppress Us from collecting and using Your Personal Information, which means We can continue to store Your Personal Information but we cannot further collect or use it in any way;
  - (vi) obtain and reuse any Personal Information We hold about You for Your own purposes across different services, which allows You to move, copy or transfer Your Personal Information easily from the Company to another place notified by You to Us in a safe and secure way without hindrance to the usability of Your Personal Information;
  - (vii) object to the processing of Your Personal Information on legitimate grounds;
  - (viii) opt out of receiving any promotional or marketing material by clicking on the “Unsubscribe” button or by sending an email to [hello@nonucare.com](mailto:hello@nonucare.com). Please note that if You withdraw Your consent, this will not affect the lawfulness of our use and processing of Your information if such processing is based on another lawful basis other than consent;

7.2 Any request received by Us in relation to the aforesaid shall be acknowledged within 30 days of receipt of such request.

## **8. CONSENT AND WITHDRAWAL OF CONSENT**

8.1 Generally We do not rely on consent as a legal basis for processing Your Personal Information other than in relation to sending third party direct marketing communications to You via email or text message. You have the right to withdraw Your consent to marketing at any time by contacting us at [hello@nonucare.com](mailto:hello@nonucare.com).

## **9. USE OF INFORMATION COLLECTED**

9.1 We do not share any Personal Information with any third party (not being an affiliate, third party service provider including a practitioner or a group company of Us) without Your consent, except when directed by law. The Company can use Personal Information and/or Usage Information to verify User identity the context of any engagement initiated by a User.

9.2 We will communicate with You using the contact information provided in order to respond to any queries that You may have, to provide any information requested regarding the Services or to send marketing and promotional material on our Services. You can choose to opt out of receiving such promotional and marketing communications by sending us an email at [hello@nonucare.com](mailto:hello@nonucare.com). We may also use Your Personal Information to send You information in relation to our Services based on the analysis of the Usage Information collected. We may also send strictly service-related announcements, for instance, if our Services are temporarily suspended for maintenance, we may send You an email, text message, flash notification or telephone call. If You do not wish to receive such alerts, You have the option to unsubscribe from such emails or opt out by sending an email to [hello@nonucare.com](mailto:hello@nonucare.com).

9.3 We, our affiliates or third party service providers including practitioners may use Personal Information or Usage Information collected in the following ways:

- (i) to operate and improve the Website and tools associated with the Website;
- (ii) to create aggregated and anonymized information to determine which Website features are most popular and useful to Users, and for other statistical analyses;
- (iii) to prevent, discover and investigate violations of this Privacy Policy or the Terms and Conditions, and to investigate fraud or other matters;
- (iv) to customize the content or the Services on the Website for You, or the communications sent to You through the Website;
- (v) to provide You the Services;
- (vi) to improve our ability to provide You the Services;
- (vii) to observe, improve and administer the quality of Services;

- (viii) to analyse how the Website is used, diagnose technical problems;
- (ix) to remember the basic information provided by You for effective access;
- (x) to confirm Your identity in order to determine Your eligibility to use the Website and avail the Services;
- (xi) to notify You about any changes to the Website;
- (xii) to transmit, share or transfer the data to a group company or affiliate of Us to enable such group company or affiliate to provide You with the Services;
- (xiii) to enable Us to comply with Our legal and regulatory obligations;
- (xiv) for the purpose of sending administrative notices, Service related alerts and other similar communication with a view to optimizing the efficiency of the Website;
- (xv) to do market research, troubleshooting or project planning,
- (xvi) to protect against errors, fraud and other criminal activity; and
- (xvii) to reinforce the Terms of Use.

9.4 We may share non-Personal Information, such as aggregated User statistics and log data, with our business partners for the purposes of industry analysis, demographic profiling, to deliver targeted advertising about other products or services, or for other business purposes. This information is solely used to analyze the Website and understand usage statistics, as mentioned above, and is anonymous. The Company may share this data with its business partners on an anonymous basis. We do not sell, share, rent or trade the information we have collected about You, including Personal Information, other than as disclosed within this Privacy Policy or at the time You provide Your information. We do not share Your Personal Information with third parties otherwise than as mentioned under this Privacy Policy for those third parties' direct marketing purposes unless You consent to such sharing at the time You provide Your Personal Information.

9.5 You may be presented with an opportunity to receive information and/or marketing offers directly from third parties with whom You have created a transaction through the Website. If You do agree to have Your Personal Information being shared, Your Personal Information will be disclosed to such third parties and all information You disclose will be subject to the Privacy Policy and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, You should review the privacy policies and practices of such third parties prior to agreeing to receive such information from them. If You later decide that You no longer want to receive communication from a third party, You will need to contact that third party directly.

9.6 We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. Thus, we may access, use, store, transfer and disclose Your information (including Personal Information), including disclosure to third parties such as government or law enforcement officials or private parties as we reasonably determine is necessary and appropriate: (i) to satisfy any applicable law, regulation, governmental requests or legal process; (ii) to protect the safety, rights, property or security of the Company, our Services, the Website or any third party; (iii) to protect the safety of the public for any reason; (iv) to detect, prevent or otherwise address fraud, security or technical issues; and /or (v) to prevent or stop any activity we consider

to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity. Such disclosures may be carried out without notice to You.

9.7 We may share Your information, including Your Personal Information and Usage Information with our parent, subsidiaries and affiliates for internal reasons. We also reserve the right to disclose and transfer all such information: (i) to a subsequent owner, co-owner or operator of the Website or applicable database; or (ii) in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our membership interests and/or assets or other corporate change, including, during the course of any due diligence process. You will be notified via email and/or through a prominent notice on the Website of any change in ownership or uses of Your Personal Information, as well as any choices You may have regarding Your Personal Information.

9.8 We may partner with another party to provide specific services if required. When You sign-up for the Services, We will share names or other Personal Information that is necessary for the third party to provide these Services. Our contractual arrangements with such third parties restrict these parties from using Personal Information except for the explicit purpose of assisting in the provision of these Services. We also protect Your Personal Information off-line other than as specifically mentioned in this Privacy Policy. Access to Your Personal Information is limited to employees, agents or partners and third parties, who We reasonably believe will need that information to enable Us to provide Services to You. However, We are not responsible for the confidentiality, security or distribution of Your own Personal Information by our partners and third parties outside the scope of our agreement with such partners and third parties.

## **10. THIRD PARTY CONTENT AND LINKS TO THEIR SERVICES**

10.1 The Website may contain content that is supplied by a third party, and those third parties may collect website usage information and other information when web pages from any online or mobile services are provided to Your browser. In addition, when You are using the Website, You may be directed to other websites that are operated and controlled by third parties that we do not control. We are not responsible for the privacy practices employed by any of these third parties. These other websites may send their own cookies to You, independently collect data or solicit Personal Information and may or may not have their own published privacy policies. When You leave the Website, we encourage You to read the privacy statements of all third party websites before submitting any information to third parties.

## **11. DATA TRANSFER**

11.1 Your Personal Information collected through the Website may be stored and processed in India or any other country in which We or Our subsidiaries, affiliates or service providers maintain facilities. We may transfer information that We collect about You, including Personal Information, to affiliated entities, or to other third parties across borders and from Your country



or jurisdiction to other countries or jurisdictions around the world. If Your Personal Information is transferred to another country, We will ensure that, where those countries are not deemed to have adequate protection, We have signed agreements incorporating the Model Contract Clauses to ensure the adequate protection of Your Personal Information.

## **12. DATA RETENTION**

- 12.1 Your information will be retained by Us for as long as it is needed for Us to provide the Services to You. The Company will retain and use your information as necessary to comply with legal obligations. If You wish to cancel Your account or request that we no longer collect, process or retain Your information to provide Services, You may contact Us at [hello@nonucare.com](mailto:hello@nonucare.com).

## **13. SECURITY**

- 13.1 Personal Information and Usage Information We collect is securely stored within Our databases, and We use standard, industry-wide, commercially reasonable security practices such as: (i) encryption, firewalls and SSL (Secure Socket Layers) for protecting Your Personal Information; (ii) ensuring ongoing confidentiality, integrity, availability and resilience or processing systems and services; (iii) ensuring We can restore access to Personal Information in a timely manner if a physical or technical incident occurs; and (iv) regular testing, assessment and evaluation of the effectiveness of our technical and organizational measures to ensure Your Personal Information is secure.
- 13.2 However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the security of our databases, nor can We guarantee that Personal Information You supply won't be intercepted while being transmitted to Us over the Internet or wireless communication and any Personal Information You transmit to Us You do at Your own risk.

## **14. COMPROMISE OF PERSONAL INFORMATION**

- 14.1 In the event that Personal Information is compromised as a breach of security, We will promptly notify You in compliance with applicable law.

## **15. CHILDREN'S PRIVACY**

- 15.1 Protecting the privacy of young children is especially important. For that reason, We do not knowingly collect or solicit Personal Information from anyone under the age of 18.
- 15.2 In the event that we learn that we have collected Personal Information from a child under age 18, we will delete that information as quickly as possible.

15.3 If You believe that we might have any information from or about a child under 18, please contact us at [hello@nonucare.com](mailto:hello@nonucare.com).

## **16. CHANGE IN INFORMATION AND CANCELLATION OF ACCOUNT**

16.1 You are responsible for maintaining the accuracy of the information You submit to us, such as Your contact information provided as part of account registration. If Your Personal Information changes, or if You no longer desire to access the Website, You may correct, delete inaccuracies, or amend information by making the change on our member information page or by contacting us through [hello@nonucare.com](mailto:hello@nonucare.com) and We will respond within 120 hours of receipt of communication.

16.2 You may also cancel or modify Your communications that You have elected to receive from the Website by logging into Your User account and changing Your communication preferences or by sending us an email on [hello@nonucare.com](mailto:hello@nonucare.com).

16.3 If You wish to cancel Your account or request that we no longer use Your Personal Information to provide You with details with respect to our Services and the Website, please write to us at [hello@nonucare.com](mailto:hello@nonucare.com).

## **17. OPT IN**

17.1 If You wish to specifically opt for receiving non-essential communications such as promotional and marketing-related information regarding the Company, the Website and the Services, please send the Company an email at [hello@nonucare.com](mailto:hello@nonucare.com).

## **18. CHANGES TO THE PRIVACY POLICY**

18.1 From time to time, We may update this Privacy Policy to reflect changes to Our information practices. Any changes will be effective immediately upon the posting of the revised Privacy Policy on the Website. If We make any material changes, We will notify You by email (sent to the e-mail address specified in Your account) or by means of a notice on the Website prior to the change becoming effective. We encourage You to periodically review this page for the latest information on our privacy practices.

## **19. REDRESSAL OF GRIEVANCES**

19.1 If You have any questions or concerns about this Privacy Policy, please feel free to contact our Grievance officer in writing at [hello@nonucare.com](mailto:hello@nonucare.com) or using the details provided on our 'Contact Us' page. We will use reasonable efforts to respond promptly to requests, questions or concerns You may have regarding Our use of Personal Information about You.

## SUMMARY OF CONTACT INFORMATION

The contact information provided by Us under this Privacy Policy is as follows:

- i. You can access this Privacy Policy on our website at <https://nonucare.com/privacy-policy>
- ii. You can contact Us by mail at 1-1-719/2&3, Near Narmada Hospital, Gandhi Nagar, Hyderabad - 500080, Telangana
- iii. You can contact Us by phone at +91-9849269001
- iv. You can contact Us by e-mail at [hello@nonucare.com](mailto:hello@nonucare.com)
- v. You can opt out of receiving any promotional or marketing material by clicking on the “Unsubscribe” button in the email, or by sending an email to [hello@nonucare.com](mailto:hello@nonucare.com)
- vi. You can contact the Company to cancel Your account or request that the Company no longer collect, process or retain Your information to provide Services at [hello@nonucare.com](mailto:hello@nonucare.com)
- vii. You can address any queries on this Privacy Policy to [hello@nonucare.com](mailto:hello@nonucare.com)
- viii. If You believe that we might have any information from or about a child under 18, please contact us at [hello@nonucare.com](mailto:hello@nonucare.com)
- ix. You may correct, delete inaccuracies, or amend Your Personal Information by making the change on our member information page or by contacting us through [hello@nonucare.com](mailto:hello@nonucare.com)
- x. You can cancel or modify Your communications that You have elected to receive from the Website by sending us an email on [hello@nonucare.com](mailto:hello@nonucare.com)
- xi. You can opt to receive non-essential communications such as promotional and marketing-related information regarding the Company, the Website and the Services by sending Us an email at [hello@nonucare.com](mailto:hello@nonucare.com)