

PRIVACY POLICY

Effective Date: 6 March 2023

AarogyaAI Innovations Pvt. Ltd., a company incorporated under the Companies Act 2013, having its registered office at No. 677, 1st Floor, Suite No. 918, 13th Cross, Sector 1, HSR Layout, Bangalore 560102 (hereinafter referred to as “**AarogyaAI**” or “**AIPL**”). AarogyaAI provides healthcare services through the website <https://aarogya.ai> (“**Website**”).

In this Privacy Policy (“**Policy**”), the “**Company**”, “**Aarogya**”, “**we**” “**us**”, “**its**” and “**our**” refer to the company and its affiliates, and “**user**”, “**you**” and “**your**” refer to you, the user of our Services.

Your access to the AarogyaAI website and its account and usage is subject to your compliance with all the terms and conditions set forth herein, read along with all documents, including but not limited to; applications forms and undertakings, signed by you while accepting our service, and any terms/consents/policies included on AarogyaAI®’s Website including Terms and Conditions available at <https://aarogya.ai/TermsAndConditions>.

INTRODUCTION

This Policy tells you how we use, disclose, and protect information collected while using services hosted by AarogyaAI. This Policy covers only information that is collected through the Services provided by us and excludes other websites that may be linked to or from the Services or the practices of companies that we do not control, employ or manage.

By accepting the Policy, you are expressly consenting to our collection, use, and disclosure of your information as described in this Policy and to all other terms herein.

This Policy supplements our website’s Disclaimer, Terms and Conditions, and Cookie Policy, and is not intended to override or replace them. on,

If you have any questions, please contact us at the email address provided in the “Contact Details” section.

WHAT INFORMATION DO WE COLLECT?

A. Information you provide:

We collect information from you when you use the Services, including when you create an account, update your profile, or contact customer support.

(i) Subscription:

(ii) Before you can use the website and its services, you may be required to subscribe. When you subscribe, we collect your contact and other information, which may include your name, phone number, email address, date of birth, gender, photograph, video verification, and signature, along with other identity-related documents.

(iii) Your account credentials include your username (i.e., your email address), password, and information for authentication and account access.

(iv) Billing:

(v) When you sign up for our account services, certain fees and charges may apply. These charges are nominal, transparent, and disclosed by AarogyaAI upfront so that you know what you are paying or being charged for.

(vi) Voluntarily-provided information

(vii) For any other information you choose to voluntarily provide to us that we do not request, you are solely responsible for such information.

B. Information collected automatically:

We automatically collect information when you use the Services, through tracking technologies like cookies, web beacons, tags and scripts, software development kits (or SDKs), and beyond. The categories of information we automatically collect include:

(i) General Information

(ii) We collect information about your use of the Services when you subscribe to our services.

(iii) Activities

(iv) We may collect your usage information based on your activities, like statistics on your preferences, practices, achievements, and milestones.

(v) Other usage data

(vi) We collect computer sign-on data, features you use, the pages you view, the time of day you use the Services, traffic to and from the Services, the Services you obtain or consider, and other information about your use of the Services.

C. Cookies:

AarogyaAI may use third-party advertising companies to serve advertisements on our behalf. These companies may employ cookies and action tags (also known as single-pixel gif or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous.

D. Information collected from other sources:

(i) Privately owned database:

(ii) We may collect information from marketing, data analytics, and social media databases to supplement the data we collect about you. This data sometimes includes your mailing address, your gender, your age, your household income, and other demographic data.

(iii) Social media platforms and other services:

(iv) We may use technologies operated or controlled by other companies in our Services. Our Services include hyperlinks that connect you to websites, platforms, and other services not

operated or controlled by us. If you link your social media or third-party account to your subscriber account, you authorize us to collect, store, and use the information they share with us (e.g., your email address). You can unlink your subscriber account from the social media third-party account at any time. We also receive information from social networks when you engage with our content, reference our Services on social media, or grant us permission to access information from social networks. Please note that when you interact with other parties, including when you leave our Services, those parties may independently collect information about you and solicit information from you. The information collected and stored by those parties remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services, and whether they store information in India or elsewhere. We encourage you to familiarize yourself with their privacy policies and terms of use.

(v) Publicly-Available Sources:

(vi) We may collect information from publicly-available sources, including data in the public domain.

E. Improving the Services

We are constantly improving our Services and we often introduce new features that require the collection of new information or use what information we already have differently. If our collection or use of information materially changes, we will notify you as detailed in the “Policy Changes” section below.

HOW DO WE USE YOUR INFORMATION?

We understand the importance of your Personal and Non-Personal Information and ensure that it is used for the intended purpose only. We access, store, and use the combined information we collect from you in accordance with the applicable laws to provide our Services, to research and develop new ones subject to the limitations set out in this Privacy Policy. We may combine your information with information we collect from other sources to improve the website and for other business and commercial purposes. Our business purposes are set out below.

We may use the information we collect about you to:

- (i) fulfil the purposes disclosed when you provided your information to us like when you create, join, or use our Services;
- (ii) provide and deliver the customer support you request and collect payment (where applicable) for the services and products requested;
- (iii) set up and verify your account and user profile based on your preferences;
- (iv) provide you with features, like setting notifications, daily reminders, playlists, and statistics; alert you to your upcoming events; and show you your history;
- (v) carrying out research, planning, and statistical analysis;
- (vi) communicating with you, including providing you with updates on changes to products, services, and facilities including any additions, expansions, suspensions, and replacements of or to such products, services, and facilities and their terms and conditions;
- (vii) managing our infrastructure and business operations and complying with internal policies and procedures;
- (viii) addressing or investigating any complaints, claims, or disputes;

- (ix) conducting screenings or due diligence checks as may be required under applicable law, regulation, or directive or under a contractual arrangement with our Partner Institutes or Companies;
- (x) regulatory reporting, management reporting, risk management;
- (xi) To enter into a contract with you or to take steps pursuant to your request prior to entering into a contract.
- (xii) to use it in other ways as required or permitted by law or with your consent;
- (xiii) The data collected by cookies helps us track, analyze and understand your trends so as to enable us to understand lacunas (such as slow response time on our website page) and improve your interactive experience of using our Services, our design, features, and functionalities;
- (xiv) Improve and develop our products and services;
- (xv) To compare information for accuracy, and verify that our internal processes work as intended and comply with legal, regulatory, and contractual requirements;
- (xvi) We also use the information to detect and prevent fraud, cyberattacks, or unauthorized robot activities;
- (xvii) to assess customer satisfaction with our customer support team, comply with legal requirements, enforce our terms and policies, respond to claims that a listing or other content violates the rights of others, or protect the rights, property, or safety of any person;

The above activities can involve outside companies, agents, or contractors (“Service Providers”) with whom we share your information for these purposes.

SHARING INFORMATION

We may share your information with:

- (i) associated corporate entities to help detect and prevent potentially illegal acts and provide joint services to requesting users;
- (ii) service providers, consultants, or similar contractors to support or enhance the Services or our business operations, or to whom we contact in order to carry out services initiated by you;
- (iii) other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and solicited consent when using a specific service);
- (iv) law enforcement or other governmental officials, in response to a verified request relating to a criminal investigation or alleged illegal activity;
- (v) persons we believe in our sole discretion necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity;
- (vi) other business entities, should we plan to merge with, or be acquired by those business entities;
- (vii) AarogyaAI may use and share the user information with reliable and reputed third-parties with whom we are associated in order to ensure a swift and comfortable service.

We will not share your information with third parties in order for that third party to provide their own direct marketing communications to you. AarogyaAI ensures that all of the individual’s personally identifiable information will never be disclosed in ways not otherwise described in this Privacy Policy. By way of example (without limiting the foregoing), AarogyaAI may be forced to disclose information to the government, law enforcement agencies or third parties.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

SERVICE PROVIDERS

Our Service Providers may provide us with a variety of administrative, statistical, and technical services. We will only provide Service Providers with the minimum amount of information they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our Service Providers to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights (as applicable).

PASSWORD AND SECURITY

Your password deserves careful thought and protection. Use unique numbers, letters, and special characters, and do not disclose your password to anyone. If you do share your password or your information with others, remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, you may lose substantial control over your information and may be subject to legally binding actions taken on your behalf. If your password has been compromised for any reason, you should immediately access your profile on the website to change your password.

FOR HOW LONG DO WE KEEP YOUR INFORMATION?

We will hold your information on our systems only for as long as required to provide you with the Services you have requested or to perform the purpose for which that information was collected.

Where you sign up to receive email marketing from us, we will retain your email address on file should you ever ‘opt out’ of receiving emails from us. We will retain your email address in this way in order to ensure that we continue to honour and respect that opt-out request.

In some circumstances, you can ask us to delete your data. See the “Your Rights and Choices” section below for further information.

APPLICABILITY

Except as otherwise expressly included in this Policy, this Policy addresses only the use and disclosure of information we collect from you. If you disclose your information to others, whether they are users of the Services or other apps throughout the Internet, different rules may apply.

The Services may, from time to time, contain links to and from the Services of our partner networks, advertisers, and affiliates. If you follow a link to any of these external websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their policies. Please check these policies before you submit any personal information to these external websites.

CHILDREN

We reserve the right to limit access to Services to those over 18 years of age.

YOUR RIGHTS AND CHOICES

A. Access to your information:

You may request a record of your Personal Information being processed by us, upon the verification of your identity and other information as per the Company's internal policy.

B. Review, Correct, and Rectify your information:

You may review, correct or rectify the inaccurate Personal Information that is stored with us.

C. Withdrawing your consent

You may withdraw consent to processing that you have given us and prevent further processing of your Personal Information subject to the terms of this Privacy Policy; (b) You may also withhold your consent prior to the collection and processing of your combined information.

D. Your Right to stop receiving communications

Where we send you e-mail marketing communications you have the right to opt out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication or through your account or by following the unsubscribe instructions provided in the email you receive). If you opt-in to receive push notifications we will use the information you give us to provide you with those notifications and improve future notifications. If you no longer wish to receive push notifications through our website, you may turn them off at the device level or by accessing your account settings on the website. Alternatively, if for any reason you cannot use the methods described above, or if you would prefer to contact us directly – you can unsubscribe by writing to us and telling us which communications you would like us to stop sending you.

E. Exercising your rights

When you write to us making a request to exercise your rights, we are entitled to ask you to prove that you are whom you say you are. If necessary, we may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which rights you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case, we will tell you).

POLICY CHANGES

We may amend this Policy at any time by posting the amended terms on the Website, which will automatically take effect after they are initially posted except as otherwise specified. Please revisit the Website periodically for the latest information on our privacy practices. Once posted, those changes are effective immediately unless stated otherwise. Continued access or use of the AarogyaAI Services constitutes your acceptance of the changes and the amended Privacy Policy. However, if you do not agree with the changes, please do not continue to use the AarogyaAI Services or submit information to us and notify us about your disagreement over an email, and upon confirmation from the Company your access to the Platform is suspended.

HOW TO CONTACT US

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below for your reference:

Aniruddh Sharma (aniruddh@aarogya.ai)