

DATA PRIVACY POLICY

This privacy policy is an electronic record in the form of electronic contract formed under the Information Technology Act 2000 and the rules made there under 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.

This privacy policy is a legally binding document between you and the company. The terms of this privacy policy will be effective upon your acceptance of the same (directly or indirectly in electronic form) and will govern the relationship between you and the company for your use of this website.

This document is published and shall be construed in accordance with the provisions of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data of Information) Rules, 2011 under Information Technology Act, 2000 that require publishing of the privacy policy for collection, use storage and transfer of sensitive personal data or information.

Please read this privacy policy carefully. By using the website, you indicate that you understand, agree and consent to this privacy policy. If you do not agree with the terms of this privacy policy, please do not use this website. You hereby provide your unconditional consent or agreements to the company as provided under section 43A and section 72A of Information Technology Act, 2000.

By entering this website (henceforth referred to as “Website”, You (*defined below*) agree with the terms of this “Privacy Policy”. By submitting Your Information on the Website, You will be treated as having given Your permission to us for collecting, storing, using and processing the Information in a manner provided in this Policy. Please note that the Website herein may also include any software based mobile application, as may be developed or used or authorised to use by the Company (*defined below*).

This Privacy Policy (defined below) was last updated on: 03 February 2020 and is effective henceforth.

ZELTS INDIA PRIVATE LIMITED, a company registered under the laws of India and having its registered office at A-313 And 315, Third Floor Ansal Chambers- 1,3, Bhikhaji Cama Place New Delhi New Delhi DL 110066 India, hereinafter referred to as “**Company**” or “**we**” or “**our**” or “**us**”.

It is hereby stated that the Company values Your (“**You**” / “**Your**” wherever referred to in this Privacy Policy, would also apply to the ‘Users’, ‘Visitors’ of the Website, consumers ordering goods through the Website/Company and the ‘Direct Seller’ as registered with the Company) privacy and is committed to take reasonable precautions to protect your information consisting of Personal Information and ‘Sensitive Personal Data or Information’ (collectively “**Information**”) and comply with all legal, regulatory and/or contractual obligations related to privacy. Company has adopted the “Privacy by Default” principles in its approach to data privacy i.e. privacy of data and information is upheld first by default. If you are using our Website on behalf of a company, partnership, association, government or other organisation (your “**Organisation**”), you agree to notify your Organisation’s relevant individual owners, shareholders, directors, officers, managers, employees and other relevant individuals whose Personal Information we collect or you provide to us from time to time (“**Connected Persons**”) of the collection of their Personal Information, and you agree to obtain your Connected Persons’ consent to the processing of their Personal Information in accordance with this Privacy Policy as required by applicable laws and regulations. When this Privacy Policy refers to “you” or “your” this includes you and any Connected Persons. If you or any Connected Persons would like to request your Personal Information be corrected, amended or removed from our database/Website, please contact us at dataprotection@zeltseller.in.

In this Policy, we detail the information that we collect about you when you visit our Website, and how we would use and disclose the information so collected. The information shall be collected while availing the services as available on the Website or buying goods from the Company.

This Policy covers the processing, storage and access to Information as required under lawful and/or contractual activities with Company or otherwise required in the normal course of business. It describes Company's policies and procedures on the collection, usage and disclosure of Information provided/received by individuals and meets the requirements established under:

- The Information Technology Act, 2000 – Section 43A;
- The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011; and
- Information Technology (Intermediaries Guidelines) Rules, 2011.

Consequently, any grievance or complaint may be intimated to the Grievance Officer who may be reached at complaints@zeltseller.in. The complaint may be redressed within a period of 45 days from the date of receiving the complaint on the aforementioned e-mail id.

If you have any questions or comments about this Privacy Policy, please contact us at dataprotection@zeltseller.in. Your use of the Website and any personal information you provide on the Website remains subject to the terms of this Policy and Website Terms of Use and both the Company policies have to be read together.

1. INFORMATION COVERED BY THIS POLICY

We may collect following information from You and this Policy applies to all such information collected and processed by us:

- 1.1. Personal Information is the information related to you, or a combination of pieces of information that could reasonably allow you to be identified. Personal information may consist of including but not limiting to, full name, personal contact numbers, residential address, email address, gender, age, nationality, date and place of birth, marital status, PAN, registration number, user id, Passport details (including number, issue date, issue location and expiration date) and Unique ID number to the extent permitted or required by applicable law, product preferences, billing name, billing address, purchasing history and spending behaviour, driving license, Election Card, Communication preferences, your website usage, IP-address, browser type and operating system. While information such as date of birth in isolation may not be enough to uniquely identify you, a combination of full name and date of birth may be sufficient to do so.
- 1.2. Sensitive personal data or information (“**SPDI**”) that is collected, received, stored, transmitted or processed by the Company, consisting of:
 - 1.2.1. Passwords;
 - 1.2.2. Any detail relating to the above personal information categories as provided to the Company for providing service/goods;
 - 1.2.3. Financial information such as bank account or credit card or debit card information;
 - 1.2.4. Any of the information received under above personal information categories by Company for processing, stored or processed under lawful contract or otherwise.

Please note that any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as SPDI.

2. PURPOSE & SHARING OF DATA

2.1. PURPOSE

Company shall collect and use Information for legitimate business purposes, including but not limiting to:

- 2.1.1. Enabling you to download product information, order goods, becoming an authorised direct seller and take advantage of certain other features of the Website;
- 2.1.2. Provide information or interactive services through this Website, to your e-mail address or, where you wish it to be sent by post, to your postal address;

- 2.1.3. to seek Your feedback or to contact you in relation to the services and goods offered on the Website;
 - 2.1.4. to process orders or applications submitted by you;
 - 2.1.5. to administer or otherwise carry out Company's obligations in relation to any agreement that you may have with Company, including but not limiting to the direct seller agreement;
 - 2.1.6. to anticipate and resolve problems with any goods or services supplied to you;
 - 2.1.7. to create products or services that may meet your needs;
 - 2.1.8. to process and respond to requests, improve Company's operations, and communicate with you about Company's products, services and businesses;
 - 2.1.9. improve the Website, enforce terms, conditions and policies, comply with applicable legal requirements, industry standards and our policies;
 - 2.1.10. to maintain your account in accordance with your instructions and requests;
 - 2.1.11. to provide personalised help and instructions, to protect any rights, property or safety of ours, our affiliate companies, or other users of our Website; and to administer Website and for internal operations, including troubleshooting, data analysis, testing, research, security, fraud-detection, account management, and survey purposes;
 - 2.1.12. to facilitate your use of the Website through the use of cookies (*e.g.*, to offer the shopping basket facility, to remember log in details, etc.);
 - 2.1.13. further, We may use the Information / SPDI we obtain about you to:
 - (A) manage your registration as a customer or direct seller.
 - (B) create and manage your online account and respond to your inquiries;
 - (C) process your orders of goods or services;
 - (D) communicate with you (*e.g.*, about products or services that we offer, or intend to offer);
 - (E) operate, evaluate and improve our business, including by:
 - evaluating your satisfaction with our current communications, materials, products and/or services;
 - developing new goods and services and determining the effectiveness of our advertising; and
 - tracking and analysing your use of goods, materials and/or services;
 - 2.1.14. track, document and analyse your line of sponsorship;
 - 2.1.15. assessing your performance under your registration or business relationship with us;
 - 2.1.16. provide information to you related to your purchases and under the loyalty program;
 - 2.1.17. provide business performance information to you, provide your name, address, telephone number or e-mail address to people both your upline and your downline in the chain.
 - 2.1.18. provide business performance information to you (*e.g.*, information on your line of sponsorship, purchase volumes, earned bonuses, levels of awards, your referring direct seller / consumer or, and your upline direct seller as per the marketing plan);
- If you choose not to provide your personal data or withdraw consent in writing subsequently, we may not be able to provide the above services and reserve the right to terminate any contract with you.**

2.2. SHARING OF INFORMATION/DATA

Company does not sell, rent or trade or publish your personal and sensitive data except as required by law. Company may share your personal and sensitive data only with:

- 2.2.1. Entities within the Company's group to whom it is reasonably necessary or desirable for Company to disclose personal and sensitive data. Some of them may be located in countries other than the country in which the data were originally collected. When we transfer your personal data to entities in other countries, we will protect that data as described in this Privacy Policy and in accordance with applicable law;
- 2.2.2. Government authorities or other third parties, if required by law or reasonably necessary to protect the rights, property and safety of others or ourselves;

- 2.2.3. With direct sellers in your upline or downline organisation, to support your business and / or allow communication regarding product advise, ordering advise and product information for the products that you order from Company and with the direct sellers in your upline;
- 2.2.4. In the event of an internal restructuring of our or our affiliates businesses, or the sale of the Company or any of its business or assets to a third party, the entity that consequently operates Website may be a different entity to us and we will transfer your information accordingly so that your service can continue;
- 2.2.5. Third party service providers: service providers supplying services to support, improve, our services. We also use service providers to help speed up content delivery to you in your region using acceleration points and content delivery networks; and to provide location and mapping data. Any third party (selected by us) with whom we share user data will provide the same or equal protection of user data as stated in this Policy.

3. COLLECTION OF INFORMATION

Only minimum Information required to meet the purposes mentioned in this Policy shall be collected from you. Neither Company nor any of its representatives shall be responsible for the authenticity of such Information provided by you. As normal business practice, Company may collect Information in order to enable the secure online authentication, interaction and transaction with natural persons. This may include the installation of cookies and the collection of other session data. Furthermore,

- 3.1. Company collects your personal data through the registration form that you complete and send to us electronically through the Website in order to become a direct seller or purchase goods directly.
- 3.2. If you are logged in on the Website as a direct seller or consumer we may collect your personal data from you, for example, when you order products or services.
- 3.3. You may also choose to submit your personal data and other information to us through various communication channels provided on the "Contact Us" webpage of the Website.
- 3.4. Some of the information may be collected automatically by use of a "cookie". Cookies are small text files that are located on your computer and identify you as a unique user. Cookies enable us to monitor your progress throughout our services and track your status when ordering products from us. You can choose to set your browser to block cookies or you can manually delete individual or all of the cookies on your computer by following your browser's help file directions. However, this may result in you having trouble accessing and using some of our pages and features from our service.

4. ACCESS, CORRECTION OF INFORMATION AND WITHDRAWAL OF CONSENT

You will be authorised to make modifications / corrections, if required, on the Website from time to time, in your Information provide to us. In the event you are unable to do so due to lack of functionality in the Website and/or you want to withdraw your consent to provide further SPDI, You may contact us at dataprotection@zeltseller.in.

5. RETENTION, PROCESSING AND STORAGE OF INFORMATION

- 5.1. Company shall retain Information for only as long as necessary to meet legal or regulatory requirements or for legitimate business purposes for which we collect data as mentioned in this Policy.
- 5.2. Company has implemented required security practices and standards in line with the global standards and has a comprehensive documented information security program and policy in place, which contains managerial, technical, operational and physical security control measures that commensurate with the information assets being protected with Company's nature of business. It is being reviewed periodically to keep pace with business, technology and regulatory changes.

6. DISCLOSURE OF INFORMATION

- 6.1. Company shall not use or disclose Information for purposes other than as mentioned in this Policy, except with Your consent or as required by law. However, Company may be legally required to disclose the Information in the following cases:
 - 6.1.1. Where the disclosure is necessary for compliance of any legal obligation / court order;
 - 6.1.2. Where mandated under the law by government agencies to disclose such Information.
- 6.2. Where necessary, Company may disclose Information to business partners, affiliates or any third parties during the normal course for business purposes. In such cases, Company will only share Information related data when Company is assured that:
 - 6.2.1. The Information is processed legitimately and appropriately by the business partner, affiliate or third party in line with the established consent or in line with legal requirements;
 - 6.2.2. The business partner, affiliate or third party has adopted a reasonable and equivalent level of security practices and procedures to ensure security of the Information shared.

7. PRIVACY POLICY UPDATES

This Privacy Policy is current as of the effective date set forth above. Company may, in its sole and absolute discretion, change this Policy from time to time by updating this document. Company will post its updated policy on the Website and / or App on this page. We encourage you to review this policy regularly for any changes. Your continued use of this Website and / or continuing to provide Personal Information to us will be subject to the terms of the then-current Privacy Policy.

8. LINKS TO EXTERNAL WEBSITES

The Website may contain links to other websites or resources over which Company does not have any control. Such links do not constitute an endorsement by the Company of those external websites. You acknowledge that Company is providing these links to you only as a convenience, and further agree that Company is not responsible for the content of such external websites. We are not responsible for the protection and privacy of any information which you provide while visiting such external websites and such sites are not governed by this Policy. Your use of any external website is subject to the terms of use and privacy policy located on the linked to external website.