

PRIVACY POLICY OF “IN” REWARDS PROGRAM

1. GENERAL:

- 1.1. This document (hereinafter referred to as the “Loyalty Program Privacy Policy” or “‘IN’ - Inorbit’s Rewards Program Program Privacy Policy”) is an electronic record in terms of the Applicable Law.
- 1.2. For the purpose of these terms wherever the context so requires the term “**Applicable Law**” shall mean the Information Technology Act, 2000, the Digital Personal Data Protection Act, 2023 (“DPDP Act”), The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and other applicable laws, rules, regulations including their respective amendments, modifications and re-enactments from time to time.
- 1.3. This ‘IN’ - Inorbit’s Rewards Program Program Privacy Policy is generated by a computer system and does not require any physical or digital signatures.
- 1.4. This ‘IN’ - Inorbit’s Rewards Program Program Privacy Policy is published in accordance with applicable laws of India for browsing, accessing and using Online Services (*as defined herein below*).

For the purpose of these terms wherever the context so requires the term “**you**” or “**your**” or “**User**” (i.e. *Customer and Members collectively*) or “**Customers**” (i.e., *mean and include any natural or legal person who accesses, browses or uses the Online Services for any purpose whatsoever*) or “**Members**” (i.e., *mean and include any customer/user/you who enrolls in the ‘IN’ - Inorbit’s Rewards Program Program*) shall mean and include any natural or legal person who accesses, browses or uses the Online Services for any purpose whatsoever, and who shall be deemed to be a ‘Data Principal’ under the DPDP Act, 2023.

- 1.5. Your access, browsing and / or use of Online Services or by making purchase with the Retailers or provision of any digital personal data or sensitive personal data / information or data or information on Online Services or through the Retailers, constitutes your unconditional agreement to abide by this ‘IN’ - Inorbit’s Rewards Program Program’s Privacy Policy (as may be amended from time to time, including the applicable policies which are incorporated herein by way of reference), ‘IN’ - Inorbit’s Rewards Program Program Terms and Conditions on inrewards.inorbit.in and all applicable laws this ‘IN’ - Inorbit’s Rewards Program Program Privacy Policy is a legally binding document between you and Inorbit and governs your relationship with Inorbit. If you use the website or make purchase with Retailers, you shall be subject to the policies that are applicable to the website or such transaction. By mere use of the site or making the said purchase, you shall be contracting with Inorbit and terms and conditions of the Reward Program Terms and Conditions, ‘IN’ - Inorbit’s Rewards Program Program Privacy Policy, including the policies, and which will constitute your binding obligations with the Company. Do not use the site or provide digital personal data or sensitive personal data / information or personal data or data or information or transactions related information or make purchase with the Retailer if you do not agree with the terms of this ‘IN’ - Inorbit’s Rewards Program Program’s Privacy Policy as specified herein. By accepting this Privacy Policy, you acknowledge that you have read, understood, and agreed to its terms. You further provide your free, specific, informed, and unconditional consent for the processing of your personal data in accordance with this Privacy Policy. Your consent is voluntary, unambiguous, and given through a clear affirmative action, as required under the Applicable Law.

For the purpose of these terms wherever the context so requires the term “**Retailer**” shall mean any third-party merchant, store, brand, or service provider operating within Inorbit Malls, participating in the ‘IN’ - Inorbit’s Rewards Program Program, who may collect, process, or share personal data or data related to purchases made by you at the retailer’s store, including but not limited to name, mobile number, email address.

2. ‘IN’ - INORBIT’S REWARDS PROGRAM PROGRAM POLICY PURPOSE AND DEFINITION:

- 2.1. This 'IN' - Inorbit's Rewards Program Program's Privacy Policy describes the various types of personal information, Personal Data (as defined below) and Sensitive Personal Data (as defined below) (collectively, "**Personal Information**") collected on our website/microsite, including WhatsApp chatbot, and mobile applications ("**Online Services**") as well as by participating Retailers at the time of your purchase. It explains how that Information is used and shared, the lawful bases for our use of your Information, rights in relation to it and, how to contact us for further information.
- 2.2. For the purpose of this 'IN' - Inorbit's Rewards Program Program's Privacy Policy, sensitive personal data or information of a person ("**Sensitive Personal Data**" or "**Information**") and any person data or digital person data of a person or data principal ("**Personal Data**") is as defined under the Applicable Laws. The term Personal Information in this Privacy Policy includes Sensitive Personal Data or Personal Data or Digital Personal Data or Information, wherever appropriate and/or mandated under the IT Act, SPDI Rules, and the DPDP Act.
- 2.3. We care about our Customers/Members and understand as well as respect your privacy. This 'IN' - Inorbit's Rewards Program Program's Privacy Policy (together with the terms of use and any other documents referred to therein) sets out the basis on which Inorbit Malls (India) Private Limited (a company incorporated under the Indian Companies Act, 1956 (and validly existing under the Companies Act, 2013) with its registered office at Raheja Towers, G Block, Bandra-Kurla Complex, Bandra (E), Mumbai – 400051) or its subsidiaries (collectively hereinafter referred to as the "**Company**") collects and processes any Personal Information (as defined hereinabove) obtained from you or provided by you or collected from the Retailers while you as a User access or participate in our 'IN' - Inorbit's Rewards Program Program or make purchase with the Retailers. IN Reward Program shall mean the loyalty program operated by the Inorbit that allows registered members to earn, accumulate, and redeem rewards based on qualifying transactions or activities at participating Retailers or through designated digital platforms and which is available through Inorbit website [www.inorbit.com, <https://inrewards.inorbit.in/> and <https://inorbitonline.com>] ("**Websites**"), Inorbit IN Mobile application, Whatsapp Bots, other products, and features ("**IN Services**"), (together "**IN Reward Program**").

For the purpose of these terms wherever the context so requires the term "**WhatsApp Bot**" shall mean an automated messaging tool on whatsapp used by the Company to interact with Users for services related to the 'IN' - Inorbit's Rewards Program Program.

- 2.4. Your privacy is of utmost importance to us and protection of your Personal Information is a key commitment for us. We are governed by the provisions of the IT Act (as amended from time to time), SPDI Rules (as amended from time to time) and DPDP Act (as amended from time to time, including rules made thereunder); that require publishing of the In-Reward Privacy Policy for collection, use, storage and transfer of Personal Information, to maintain privacy of your Personal Information.
3. **Applicability of the 'IN' - Inorbit's Rewards Program program's Privacy Policy :**
 - 3.1. By accessing or logging in to the Company's 'IN' - Inorbit's Rewards Program Program (inrewards.inorbit.in) or through Whatsapp Bot or by making purchase with the Retailers, you would be sharing with us Personal Information (including Sensitive Personal Data / Personal Data or Information). This 'IN' - Inorbit's Rewards Program Program's Privacy Policy read with the Company's Privacy Policy [[Inorbit - Privacy Policy](#)] (the "**Privacy Policy**") explains how the Company collects, uses, discloses, retains and protects the Personal Information of its Users within the framework of its activities, in particular in connection with the use by Users of the products, services, software, applications, websites, Online Services of the Company and making purchase with the Retailers. The Company reserves the right to update its 'IN' - Inorbit's Rewards Program Program's Privacy Policy (including Privacy Policy) at any time and such modifications shall be effective immediately, unless otherwise stated. Users shall regularly check to

see whether this 'IN' - Inorbit's Rewards Program Program's Privacy Policy has been modified and/or amended and/or revised. Users are deemed to have accepted any modifications and/or amendments and/or revisions to this 'IN' - Inorbit's Rewards Program Program's Privacy Policy if they continue to provide Personal Information to the Company after publication of such amended 'IN' - Inorbit's Rewards Program Program's Privacy Policy. By accessing the Online Services of the Company and by making any purchase with the Retailers, you as Users hereby provide your free, specific, informed, and unambiguous consent to the collection, storing, processing, transferring, and sharing your Personal Information with third party and service providers, without requirement for any further consent from you at any point of time.

3.2. Type of information collected and manner in which the information is collected:

Personal Information includes any information relating to the identity of any User, such as name, birth date, mobile number, address, transactions related information such as bill amount, bill date and other information pertaining to such User's natural identity, as well as its communications with the Company, which may be presented in any form. The type of information collected by the Company and/or Retailers depends on a number of factors and context and it collects only such Personal Information which it deems necessary for conducting its business and to achieve specific purposes with regard to the IN Reward Program (which is detailed in the Privacy Policy). Before submitting or disclosing any information to IN Services, please make sure to understand how any Information you provide will be used, shared, stored and handled.

4. **CONSENT AND PURPOSE:**

4.1. When you use, access, participate in the IN Reward Program or agree and accept the 'IN' - Inorbit's Rewards Program Program Terms and Conditions, it is regarded as you have provided your free, specific, informed, unambiguous and unconditional consent in relation to the terms and conditions provided in this 'IN' - Inorbit's Rewards Program Program's Privacy Policy and the same shall be accordingly construed that you have read, understood and accepted this IN Reward Privacy Policy. This 'IN' - Inorbit's Rewards Program Program Privacy Policy also applies to the information (including Personal Information, Sensitive Personal Data and Information) you have provide to us prior to or after making the purchase with the Retailers or being informed about, presented with, or directed to this 'IN' - Inorbit's Rewards Program Program's Privacy Policy.

4.2. This document supersedes any prior communication on this topic and reflects the entire and exclusive privacy policy for 'IN' - Inorbit's Rewards Program Program. We may amend our 'IN' - Inorbit's Rewards Program Program's Privacy Policy by posting a new version of it on our website without your explicit consent.

4.3. It is clarified that the Company cannot match any person's identity with the registered member and thus, the Company shall not be liable for any misuse, or any other activity that occurs through the registered account, or mobile number, or email address of the Member or Member's gadget (mobile, laptop, etc.).

4.4. By providing your personal identifiable information at the time of purchase with a Retailer or using the Inorbit website, you consent to the Retailer and Inorbit and its affiliates and associates, for the Retailer to share your mobile number with Inorbit and/or its loyalty partner, associates or affiliates, and for Inorbit and/or its loyalty partner, associates and affiliates to collect and processes your information for the Purpose (as defined in Clause 4.9 hereinbelow).

4.5. **Information you give us:**

We receive and store any such Personal Information you provide in relation to usage of IN Services .

Such Personal Information include:

- 4.5.1. Your name and contact details (such as name, address, email address, telephone number, transactions related information and other personal information);
- 4.5.2. Additional profile information (such as date of birth, gender, location, and preferred language);
- 4.5.3. Your communications and contact history with us (such as service call recordings, chat and instant messages, images, videos, communications and other content in connection with our social media channels and customer support); and
- 4.5.4. Other information (such as filter selection, service reviews, forum posts, survey responses, participation in promotions; and other user-generated content)

4.6. Information we automatically collect from use of IN Services:

We automatically collect and store certain type of information about your use of IN Services, including information about your interaction with content and services available at IN Services. We even use cookies and other identifiers. Some examples of the same are

- i) adding or removal of products from your wish list or cart;
- ii) searching something on our website or mobile application; or
- iii) redemption activity.

4.7. Non-member referrals

We may obtain your information from a friend or other contact who wants to invite you to use our Online Services. We will use your information to facilitate your invitation and administer our referral program.

4.8. Information we collect from Retailers to verify your membership status:

We may receive certain Personal Information, such as the Customer's mobile number and transaction-related details (e.g., bill amount, bill number, date of purchase), from participating Retailers at the time of your purchase. This information is used for the purpose of verifying whether you are a registered Member of the 'IN' - Inorbit's Rewards Program Program and, if applicable, to facilitate the crediting of INcoins to your account and for the Members to receive promotional notifications, marketing communications, offers, advertisements, event updates, and other engagement-related content from the Company and its partners, as part of initiatives aimed at enhancing the overall shopping, marketing, and brand experience of the Members ("**Object**").

Such information is collected and processed in accordance with the 'IN' - Inorbit's Rewards Program Program Privacy Policy and applicable data protection laws. By making a purchase at a participating Retailer and providing your mobile number at the time of purchase, you consent to such information being shared with and processed by Inorbit and/or its loyalty partner, affiliates and associates, in accordance with the 'IN' - Inorbit's Rewards Program Program Privacy Policy and applicable data protection laws.

4.9. Purposes for collecting and using Information:

In addition to the Object, the Company may collect and use Information for the following purposes ("**Purpose**"):

- (i) For the purposes of the IN Reward Program including for verifying the Customer's membership status as a Member.

- (ii) To use data to build better services.
- (iii) Provide Services or information expected or requested by Users;
- (iv) Communicate with Users as part of the activities of the Company, for internal quality assurance purposes or to manage the quality of the information provided;
- (v) Maintain, or develop Services.
- (vi) Measure performance.
- (vii) Detect and prevent fraud;
- (viii) For statistical and accounting purposes;
- (ix) Inform Users of news, updates, information and special offers concerning the Services of the Company, in accordance with applicable anti-spam legislation;
- (x) If the Company has reasonable grounds to believe that it might be useful as part of the investigation of a violation of statutory law or to ensure the protection or defence of a legal interest;
- (xi) As required or permitted by applicable law.
- (xii) Professional service providers who help us run our business, such as service providers, agents, and consultants.
- (xiii) Any agency or third party for the purpose of audit and compliance requirements of the Company as per the applicable laws and regulations, and Company's policies and procedures.
- (xiv) Government and law enforcement agencies, to (i) comply with a legal process, subpoena, order, or other legal or regulatory requirement; (ii) enforce our Privacy Policy and Terms of Use or other policies; or (iii) pursue available legal remedies or defend legal claims.
- (xv) To offer an improved user experience - We use your communications and contact history with us, as well your name, contact details and other information to assist us to improve and optimize the IN Services and to personalize and customize your experience.
- (xvi) Communication, marketing and promotional activities - we may use information to deliver and personalize our communications with you, or to administer referral programs, rewards, surveys, contests or other promotional activities.

4.10. **The information we need in regard the IN Reward Program and their respective purposes:**

- (i) **Verification**- We require the Customer's mobile number for the purpose of verifying their membership status in the 'IN' - Inorbit's Rewards Program Program.
- (ii) **Registration** - We need your name, contact and other details to create your account. This information is necessary for the adequate performance of IN Services. It is also required for us to fulfill our obligations with you when you redeem your reward points.
- (iii) **Delivery of services**- We need your name, contact details and other information to take and fulfill our services, and communicate with you about your account, services, and promotional offers.
- (iv) **Earning and redemption of points** - We need your name, contact details and other information to fulfill our obligations under the 'IN' - Inorbit's Rewards Program Program.
- (v) **Sending you account information** -We need your name, contact details and other information to provide notifications regarding any promotional offers, changes to account settings, and notices about IN Services and policies. Please note that it is the responsibility of the Member or the accessor of the IN Services to be updated about the policies and procedures of the 'IN' - Inorbit's Rewards Program Program. The Company does not take any responsibility for communication of changes to account settings, and notices about IN Services and policies.
- (vi) **To offer an improved user experience** - We use your communications and contact history with us, as well as your name, contact details and other **information** to assist us to improve and optimize

the IN Services and to personalize and customize your experience.

- (vii) **Communication, marketing and promotional activities** – We may use information to deliver and personalize our communications with you, or to administer referral programs, rewards, surveys, contests or other promotional activities.
- (viii) **Detect and prevent fraud:** We need your name, contact, and other relevant details to detect or prevent any fraud.

5. THE ONLINE SERVICES

- 5.1. The Website and Online Services are purely intended as an informational website disseminating information about the Company and its services, its associated entities and brands, their products and the sale of the associated entities products.

***NOTE:** The browsing, access and use of the Online Services (including Website) is restricted only for persons above the age of 18 (eighteen) years, who is not classified as a 'Child' within the meaning of the DPDP Act and persons who are 'competent to contract' within the meaning of the Indian Contract Act, 1872 ("Minors"). Our Website is not intended for minors (i.e. under the age of 18 years and as defined under the DPDP Act) and Inorbit does not target and/or attract any Minors. We do not knowingly or deliberately collect and/or process any Personal Information from Minors.*

- 5.2. If you are a Minor you may browse, access or use the Online Services Website only under the supervision and prior consent/ permission of a parent or a legal guardian.
- 5.3. If You are under the age of 18 years, please do not provide us with any Personal Data or Information. If you being a Minor has shared any Personal Information with us, you represent and warrant that you have the authority to do so and prior consent / permission of a parent or legal guardian has been sought by you.

6. DISCLOSURE OF INFORMATION:

The Company agrees not to publish, sell, rent or share the Personal Information of the Users with anyone except to the extent allowed in this 'IN' - Inorbit's Rewards Program Program's Privacy Policy.

6.1. Protection and accuracy of the Information:

- 6.1.1. The Company takes seriously the management of the Information of Users.
- 6.1.2. Only authorized Company personnel or its authorized service providers have access to the Personal Information of Users. These employees have been informed by the Company of their obligation to preserve the confidentiality of this personal Information.
- 6.1.3. Anyone with access to Personal Information is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- 6.1.4. The security and protection of personal Information is important to the Company. The Company applies reasonable technical, contractual, administrative and tangible measures to protect the personal Information of Users against its unauthorized use or disclosure as well as its loss or theft, including encryption of secured transactions when required. Although it is impossible to guarantee 100% protection, the Company has adopted reasonable methods that comply with our security standards to ensure protection of personal Information.

- 6.1.5. We also limit access to your Information to those employees, contractors and agents who have a business need to know.
- 6.1.6. The type of information is stored depending on the nature of information. The information is stored in (i) in the offices of the Company or in various computer systems of the Company or its service providers, or (ii) in storage installations of the Company or its service providers, or (iii) servers.
- 6.1.7. The Company will ensure that the personal Information about Users is as accurate, complete and up-to-date as possible for the purposes for which it is used. It is however the responsibility of the User to update personal Information, such as addresses, with the Company.

6.2. **Data post your leaving the 'IN' - Inorbit's Rewards Program Program :**

You may discontinue your usage / membership with us at any point of time by making such choice on our Website, mobile WAP site or mobile application. However, we retain your Personal Information as long as the Purpose for its usage exists (and as mentioned in clause 4.8 of this 'IN' - Inorbit's Rewards Program Program's Privacy Policy), after which the same is disposed off by us except for any record retention required as per applicable law. The provisions of various laws require your transaction logs to be stored for longer periods post the deletion of an account. Further, in the event of the pendency of any legal/regulatory proceeding or receipt of any legal and/or regulatory direction to that effect, we may be required by the law of the land to retain your Information for longer periods.

In case of Customers who are not Members, but whose Personal Information (such as mobile number and transaction details) was collected through their purchase at participating Retailers for the purpose of verifying membership status, such data is:

- retained temporarily, and
- deleted or anonymized if no membership match is found or if no further purpose remains.

6.3. **Partner or Third-Party Privacy Policy:**

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

7. **OUR COOKIE SETTINGS AND POLICY:**

7.1. **Purpose of Cookie:**

A "cookie" is a small piece of text file/ information stored by a web server on a web browser/ your device about your visit on our 'IN' - Inorbit's Rewards Program Program / Website / Mobile Application / online platforms so it can be later read back from that browser. Cookies allow us to recognize a specific device in order to personalize and optimize your experience. We may use cookie and tracking technology depending on the features offered. No Information will be collected via cookies and other tracking technology; however, if you previously provided Personal Information, cookies may be tied to such Personal Information. In relation to this, the Company requests through a separate cookie notice, thereby you provide your free, specific, informed, and unambiguous consent to the collection, storing, processing, transferring, and sharing of the cookie with third party and service providers, without requirement for any further consent from you at any point of time.

We use cookies when you visit our Website and Application to analyze traffic, optimize performance and content and to provide an integrated and more personalized shopping experience for Users. Cookies are small text files that are stored by your Internet browser on your computer.

7.2. Use of Cookies:

Use of cookies generally fall into four categories:

(i) **Strictly Necessary:**

These cookies are necessary to operate our Online Services. They do not store any personally identifiable information. You can set your browser to block or alert you about these cookies, but our Online Services will not work properly without these cookies.

(ii) **Performance-Related:**

These cookies collect information in an anonymous manner about how visitors use our online services and how our online services perform. These cookies allow us to recognize and count the number of visitors, their multiple preferences and help us understand which pages are the most popular, and where visitors spend most of their time.

(iii) **Functional:**

These cookies enable our website to provide enhanced functionality and personalisation, such as remembering choices you make or information you provide, what region you are in, your login information, or the pages you have viewed. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.

(iv) **Advertising and Targeting:**

These cookies allow the Company and our advertisers to deliver advertisements that are relevant to you and your interests. They may be used by us and our advertisers to build a profile of your interests and show you relevant advertisements on other sites. These cookies may track whether you clicked on an advertisement in order to limit the number of times you see a particular advertisement and help us understand the efficacy of our advertising campaigns. They do not directly store personal information but uniquely identify your browser and device. If you do not allow these cookies, you will experience less targeted advertising.

Also note that the type and nature of use of our cookies may change from time to time.

7.3. What are web beacons?

Web beacons are small graphic images that may be included on our Websites or other products or on our Online Services. Web beacons help us optimize our services and provide us and our third-party partners with analytics information, such as how many visitors a site receives. We may also use web beacons to measure response to email campaigns. Web beacons are also commonly known as “clear GIFs” or “tags”.

7.4. Changes to our privacy policy & cookie settings

Any changes we may make to our privacy policy and cookie settings will be posted on this page without any explicit consent or information to you.

8. **CONTACT:**

Please note that if you use more than one name or email address when communicating with 'IN' – Inorbit's Rewards Program via the website or WhatsApp chatbot, you may continue to receive communications from us to any name or email address not specified in your opt-out request.

- 8.1. In accordance with the DPDP Act (and rules made thereunder), the IT Act and the SPDI Rules, we have designated a grievance officer (*as defined under SPDI Rules*) under / data protection officer (*as defined under DPDP Act*) ("**Data Protection Officer**") whose name and contact details are provided herein below: -

Name: Ms. Manjiri Meshram

Designation: Asst Manager - Loyalty

Email: Manjiri.meshram@inorbit.in [mailto:](mailto:Manjiri.meshram@inorbit.in)

- 8.2. In case of any issues, communications, complaints, queries, comments or feedback as provided by you in relation to the processing of your Personal Information, you may reach out to the Data protection Officer.
- 8.3. The role of the Data Protection Officer is to:
- Redress Your grievances expeditiously;
 - act as a point of contact between you and the Company;
 - respond to any communication from you for the purpose of exercising your rights under the DPDP Act, IT Act and IT Rules.
- 8.4. The Data Protection Officer shall endeavor to acknowledge your complaints, within 72 (seventy-two) hours of the receipt of such complaint and shall seek to address and/or resolve the same within a period of one (01) month of the receipt of such complaint. You further understand and agree that the decision of the Data Protection Officer shall be final and binding in this regard.