#### **PRIVACY POLICY**

Your privacy is important to Xvirtual Systems Private Limited ("Moreficent"). This privacy statement provides information about the personal information that Moreficent collects, and the ways in which Moreficent uses that personal information. The terms "you" and "your" refer to the user of Moreficent, owned by Xvirtual Systems Tech Private Limited, a private limited company having its registered address at Flat No. 58-B, PKT C Siddhartha Extn DDA, New Delhi, South Delhi, DL 110014, India. The term "Services" refers to any services offered by Moreficent.

Please read this Policy before using Moreficent's Platform or submitting any personal information to Moreficent. This Policy is a part of and incorporated within, and is to be read along with, the Terms of Service.

#### I. YOUR CONSENT

- By using Moreficent and the Services, you agree and consent to the collection, transfer, use, storage, disclosure and sharing of your information as described and collected by us in accordance with this Policy.
- ii. If you do not agree with the Policy, please do not use or access Moreficent.

# II. AMENDMENTS

- i. Moreficent reserves the right to make changes or modify the Platform, Terms of Service and this Privacy Policy at any time. If any of these conditions shall be deemed invalid, void, or for any reason unenforceable, that condition shall be deemed severable and will not affect the validity and enforceability of any remaining conditions.
- ii. Your continued usage of the Services after any change is posted on the Platform, constitutes your acceptance of the amended Terms of Service and Privacy Policy.

### III. THIRD PARTY LINKS

- The Platform may contain links to other independent third-party Web sites ("<u>Linked Sites</u>").
   These Linked Sites are provided solely as a convenience to our Users.
- ii. Such Linked Sites are not under Moreficent's control, and Moreficent is not responsible for and does not endorse the content of such Linked Sites, including any information or materials contained on such Linked Sites.
- iii. You will need to make your own independent judgment regarding your interaction with these

Linked Sites.

iv. This Policy shall not apply to any information you may disclose to any of our service providers/service personnel which we do not require you to disclose to us or any of our service providers under this Policy.

#### IV. PERSONAL INFORMATION COLLECTION

- i. Moreficent may collect and use the following kinds of personal information:
  - Information about your use of Moreficent("Platform");
  - Information that you provide for the purpose of registering with and/or creating or updating your account on the Platform, which may include your name, email, phone number, login name and password, address, payment or banking information, date of birth and profile picture. If you sign in to the Platform through third-party sign-in services such as Google Plus or Gmail or any other social networking or similar site (collectively, "SNS"), an option of which may be provided to you by Moreficent at its sole discretion, you will be allowing us to pass through and receive from the SNS your log-in information and other user data;
  - Information that you provide for the purpose of subscribing to the Platform, including but not limited to, your phone number, address, email, billing information and credit or payment card information;
  - We may receive information about you from third parties, such as other users, partners (including ad partners, analytics providers, search information providers), or our affiliated companies or if you use any of the other websites/apps we operate or the other Services we provide. Users of our ad services and other third-parties may share information with us such as the cookie ID, device ID, or demographic or interest data, and information about content viewed or actions taken on a third-party website, online services or apps;
  - When you sign in to the Platform with your SNS account, or otherwise connect to your SNS account with the Services, you consent to our collection, storage, and use, in accordance with this Policy, of the information that you make available to us through the social media interface. This could include, without limitation, any information that you have made public through your social media account, information that the social media service shares with us, or information that is disclosed during the sign-in process. Please see your social media provider's privacy policy and help center for more information about how they share information when you choose to connect your account; and
  - any other information that you send to Moreficent.

### V. USING PERSONAL INFORMATION

- i. Moreficent may use your personal information to:
  - administer this Platform and enhance the security of the Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - personalize the Platform for you, maintain and improve our products and the Services, such as enable features to personalise your User account;
  - enable your access to and use of the Platform Services;
  - publish information about you on the Platform and to understand the Users (what they do on
    our Services, what features they like, how they use them, etc.), improve the content and
    features of our Services (such as by personalizing content to your interests), provide customer
    services, improve the platform, fix and respond to bugs, process and complete your
    transactions, make special offers, provide customer support, process and respond to your
    queries;
  - send you statements, invoices and collect payments from you;
  - generate and review reports and data about, and to conduct research on, our user base and
     Service usage patterns; and
  - send you marketing communications and to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- ii. We may combine the information we collect about you for the purposes set out above. Further, we may anonymize and/or de-identify information collected from you through the Services or via other means, including via the use of third-party web analytic tools. As a result, our use and disclosure of aggregated and/or de-identified information is not restricted by this Policy, and it may be used and disclosed to others without limitation.
- iii. We analyse the log files of our Platform that may contain Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring, app crashes, page viewed and exit websites and applications, operating system, date/time stamp, and clickstream data. This helps us to administer the website, to learn about user behaviour on the site, to improve our Services, and to gather demographic information about our user base as a whole.

- iv. Where Moreficent discloses your personal information to its agents or sub-contractors for these purposes, the agent or sub-contractor in question will be obligated to use that personal information in accordance with the terms of this Privacy Policy.
- v. In addition to the disclosures reasonably necessary for the purposes identified elsewhere above, Moreficent may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

#### VI. SECURING YOUR DATA & DISCLOSURES

- i. Moreficent will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. Moreficent will store all the personal information you provide on its secure servers. Information relating to electronic transactions entered into via this website will be protected by encryption technology.
- ii. We may share your information that we collect for following purposes:
  - With Service Providers: We may share your information with our vendors, consultants, marketing partners, research firms and other service providers or business partners, such as payment processing companies, to support our business. For example, your information may be shared with outside vendors to send you emails and messages or push notifications to your devices in relation to our Services, to help us analyse and improve the use of our Services, to process and collect payments.
  - For Crime Prevention or Investigation: We may share this information with governmental agencies or other companies assisting us, when we are:
    - Obligated under the applicable laws or in good faith to respond to court orders and processes; or
    - Detecting and preventing against actual or potential occurrence of identity theft, fraud, abuse of Services and other illegal acts;
    - Responding to claims that an advertisement, posting or other content violates the intellectual property rights of a third party;
    - Under a duty to disclose or share your personal data in order to enforce our Terms &
      Conditions and other agreements, policies or to protect the rights, property, or safety
      of Moreficent, our customers, Vendors, or others, or in the event of a claim or dispute

relating to your use of our Services. This includes exchanging information with other companies and organisations for the purposes of fraud detection and credit risk reduction.

- For Internal Use: We may share your information with any present or future member of our Group or affiliates for our internal business purposes
- With Advertisers and advertising networks: We may work with third parties such as network advertisers to serve advertisements on the Platform and on third-party websites or other media (e.g., social networking platforms). These third parties may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you.
- While you cannot opt out of advertising on the Platform, you may opt out of much interest-based advertising on third party sites and through third party ad networks (including DoubleClick Ad Exchange, Facebook Audience Network and Google AdSense). Opting out means that you will no longer receive personalized ads by third parties ad networks from which you have opted out, which is based on your browsing information across multiple sites and online services. If you delete cookies or change devices, your opt out may no longer be effective.
- To fulfil the purpose for which you provide it.
- We may share your information other than as described in this Policy if we notify you and you consent to the sharing.

## VII. OPT-OUT

- i. When you sign up for an account, you are opting in to receive emails from Moreficent. You can log in to manage your email preferences or you can follow the "unsubscribe" instructions in commercial email messages but note that you cannot opt out of receiving certain administrative notices, service notices, or legal notices from Moreficent.
- ii. If you wish to withdraw your consent for the use and disclosure of your personal information in the manner provided in this Policy, please write to us at <a href="mailto:harshad@moreficent.com">harshad@moreficent.com</a>.
- iii. Please note that we may take time to process such requests, and your request shall take effect no later than five (5) business days from the receipt of such request, after which we will not use your personal data for any processing unless required by us to comply with our legal obligations. We may not be able to offer you any or all Services upon such withdrawal of your consent.

### VIII. CROSS-BORDER DATA TRANSFERS

i. Information that Moreficent collects may be stored and processed in and transferred between any of the countries in which Moreficent operates to enable the use of the information in accordance

of the countries in which Morencent operates to enable the use of the information in accordance

with this Privacy Policy.

ii. In addition, personal information that you submit for publication on the Platform will be

published on the internet and may be available around the world. You agree to such cross-border

transfers of personal information.

### IX. CONTACT GRIEVANCE OFFICER

If you have any questions about this Privacy Policy or Moreficent's treatment of your personal information, please write:

• by email to <a href="mailto:harshad@moreficent.com">harshad@moreficent.com</a>; or

• by post to

Harshad Deo

**Xvirtual Systems Private Limited** 

Reg Office: Flat No. 58-B, PKT C Siddhartha Extn DDA,

New Delhi, South Delhi, DL 110014, India