

Privacy Statement

Last updated on 11th Jan 2020.

We care about your privacy and are committed to protecting your personal data. This privacy statement will inform you how we handle your personal data, your privacy rights and how the law protects you. Please read this privacy statement carefully before using our Services.

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In this privacy statement:

Services mean any products, services, content, features, technologies, or functions, and all related websites, applications, and services offered to you by us.

Platform means the websites, mobile apps, mobile sites or other online properties through which we offer our Services.

1. Who are we?

MAKEMYTIME, a company registered in India, is the data controller for the information you provide or is collected through this Platform.

2. What data do we collect about you?

a. Data provided through direct interactions

Registration and other account information

When you register to use our Services, we may collect the following information about you:

- if you register using your Google account: first name, last name and email address;
- if you register using your Facebook account: we collect first name and last name as appeared on your Facebook account and Facebook IDs. In the event you have provided permission to Facebook through their in-app privacy option (which appears just before you register on our Platform), we may collect your gender, age or email id depending on the permissions granted by you.; and
- if you register using your mobile number, we collect your mobile number.

Depending on the choices you make during the log-in to our Services or during the process of engaging our Services, you may opt to give the following additional personal data:

- your name;
- e-mail address;
- mobile number;

Communication through the chat feature on our Platform

When you use our chat feature to communicate with other users, we collect information that you choose to provide to other users through this feature.

b. Data we collect automatically when you use our Services

When you interact with our Platform or use our Services, we automatically collect the following information about you:

Device Information

- We collect device-specific information such as operating system version, unique identifiers. For example, the name of the mobile network that you are using. We associate the device identifiers with your MAKEMYTIME account.

Location information

- Depending on your device permissions, if you post an item on our Platform, we automatically collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, Wi-Fi access points and mobile towers. Your location data allows you to see user items near you and helps you in posting items within your location. In case we need your location data we will first show you a pop-up which will ask you to choose to allow or not to allow us to access your location data. If you do not allow us to have access to your location data, you will still be able to use our Services but with limited functionality. If you do allow us to access your location data you can always change this later by going to the

settings on our Website or App our Platform and disable the permissions related to location sharing.

Client and Log data

- Technical details, including the Internet Protocol (IP) address of your device, time zone, and operating system. We will also store your login information (registration date, date of last password change, date of last successful login), type and version of your browser.

Clickstream data

- We collect information about your activity on our Platform which includes the sites from which you accessed our Platform, date and time stamp of each visit, searches you have performed, listings or advertisement banners you clicked, your interaction with such advertisements or listings, duration of your visit and the order in which you visit the content on our Platform.

Cookies and Similar Technologies

- We use cookies to manage our users' sessions, to store your preferences language selection and deliver you relevant advertisements. "**Cookies**" are small text files transferred by a web server to the hard drive of your device. Cookies may be used to collect the date and time of your visit, your browsing history, your preferences, and your username. You can set your browser to refuse all or some cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Services/Platform may become inaccessible or not function properly.

3. Why do we process your personal information?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests to improve our Services and to provide you with a safe and secure Platform.
- Where we need to comply with a legal or regulatory obligation.

In certain circumstances, we may also process your personal data based on your consent. If we do this, we will let you know the purpose and the category of personal data to be processed at the time we seek your consent.

We have set out below a description of the ways we use your personal data, [and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate].

- **For providing access and delivering Services through our Platform**
 - If you log in using your mobile number or email id, we use your first name and last name, mobile number and/or e-mail address to identify you as a user and provide access to our Platform.
 - If you log in using your Facebook account, we use your first name and last name from your Facebook profile and the Facebook e-mail address to identify you as a user on our Platform and to provide you access to our Platform.

- the above log-information data is also used by us to deliver our Services to you in accordance with our Terms of use.
- We use your e-mail address and mobile number (by SMS) to make suggestions and recommendations to you about our Services that may be of interest to you.

We process the above information for the adequate performance of our contract with you and on the basis of our legitimate interest in undertaking marketing activities to offer you Services that may be of your interest.

- **For improving your experience on the Platform and developing new functionalities of the Platform**

We use clickstream data to

- offer you tailored content, such as giving you more relevant search results when using our Services.
- to determine how much time, you spend on our Platform and in what manner you navigate through our Platform in order to understand your interests and to improve our Services based on this data. For example, we may provide you with suggestions on content that you can visit based on the contents you have clicked.
- to monitor and report the effectiveness of the campaign delivery to our business partners and for internal business analysis.

We use your location data for the following purposes:

- to compile anonymous and aggregated information about the characteristics and behavior of MAKEMYTIME users, including for the purposes of business analysis, segmentation and development of anonymous profiles.
- to enhance the performance of our Services and to personalize the content we direct towards you. For example - with the help of location data we display ad listings which are in your vicinity to improve your buying experience.
- to measure and monitor your interaction with the third-party advertisements banners we place on our Platform.

With the help of your log-in information which includes your email ID and phone number, we map the different devices (such as desktop, mobile, tablets) used by you to access our Platform. This allows us to associate your activity on our Platform across devices and helps us in providing you a seamless experience no matter which device you use.

We process the above information based on our legitimate interest to improve your experience on our Platform and for the adequate performance of our contract with you.

- **To provide you with a safe and secure Platform**

- We use your mobile number, log data and unique device identifiers to administer and protect our Platform (including troubleshooting, data analysis, testing, fraud prevention, system maintenance, support, reporting and hosting of data).
- We analyse your communications done through our chat feature for fraud prevention and to promote safety by blocking spam or abusive messages that may have been sent to you by any other user.

We process the above information for adequate performance of our contract with you, to improve our services and on the basis of our legitimate interest to prevent fraud.

4. How will we inform you about changes in our privacy statement?

We may amend this privacy statement from time to time. We will post changes on this page and will let you know by e-mail or through our Platform. If you do not agree with the changes, you may delete your account by going to account setting and select delete account.

5. Your right to request erasure

You have the right to ask us to delete or remove your personal data.

6. Communication and marketing

We will communicate with you by email, SMS or in app notification in connection with our Services/Platform to confirm your registration, to inform you in case your ad listing has become live/expired and for other transactional messages in relation to our Services. As it is imperative for us to provide you such transactional messages you may not be able to opt -out of such messages.

You may receive marketing communications from us if you:

- have requested such information from us;
- use our Platform or Services;
- provided us with your details when you entered a competition; or
- registered for a promotion.

7. Who do we share your data with?

We may have to share your personal data with the parties set out below for the purposes set out in section 3 above.

Corporate Affiliates: We may share your data with other MAKEMYTIME group companies which are located within as well as outside EEA and help us in providing business operation services such as product enhancements, customer support and fraud detection mechanism.

Third Party Service Providers: We use third party service providers to help us deliver certain aspect of our Services for example, cloud storage facilities.

We conduct checks on our third-party service providers and require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow them to use your personal data for

their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Advertising and analytics providers: In order to improve our Services, we will sometimes share your non-identifiable information with analytics providers that help us analyse how people are using our Platform/Service. We share your information with them in non-identifiable form for monitoring and reporting the effectiveness of the campaign delivery to our business partners and for internal business analysis. For further details about our advertisers and analytics providers please refer to our **Policy on Cookies and Similar Technologies**.

Law enforcement authorities, regulators and others: We may disclose your personal data to law enforcement authorities, regulators, governmental or public bodies and other relevant third parties to comply with any legal or regulatory requirements.

We may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy statement.

Publicly available information: When you post an item for sale using our Services, you may choose to make certain personal information visible to other MAKEMYTIME users. This may include your first name, last name, your email address, your location and your contact number. Please note, any information you provide to other users can always be shared by them with others so please exercise discretion in this respect.

8. Where do we store your data and for how long?

The data we collect about you will be stored and processed in secure servers in order to provide the best possible user experience. For example – for a fast website or mobile application build up.

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Technical and organizational measures and processing security

All the information we receive about you are stored on secure servers and we have implemented technical and organizational measures that are suitable and necessary to protect your personal data. MAKEMYTIME continually evaluates the security of its network and adequacy of its internal information security program which is designed to (a) help secure your data against accidental or unlawful loss, access or disclosure, (b) identify reasonably foreseeable risks to the security of the MAKEMYTIME network, and (c) minimize security

risks, including through risk assessment and regular testing. In addition, we ensure that all payment data are encrypted using SSL technology.

Please note, despite the measures we have implemented to protect your data, the transfer of data through the Internet or other open networks is never completely secure and there is a risk that your personal data may be accessed by unauthorized third parties.

10. Links to third-party websites

Our Platform may contain links to third party websites or apps. If you click on one of these links, please note that each one will have its own privacy policy. We do not control these websites/apps and are not responsible for those policies. When you leave our Platform, we encourage you to read the privacy notice of every website you visit.