

# MDPL PRIVACY POLICY



PLEASE READ THIS PRIVACY POLICY CAREFULLY. "YOU" AND "YOUR" SHALL REFER TO THE CUSTOMER OR SUBSCRIBER OR VISITOR OF THE MDPL WEBSITE <u>www.mdlindia.co.in</u> "WE," "OUR" OR "US" OR "COMPANY" SHALL REFER TO MDPL.

"MDPL" refers to Meterology Data Private Limited a company duly existing and incorporated under the Companies Act, 2013, having its registered office at 4<sup>th</sup> Floor, Valencia Tower, 61, Dr. SS Rao Road, Parel East, Mumbai - 400 012.

This Privacy Policy describes MDPL's policy on the collection, use and disclosure of information about you in connection with your use of MDPL's Website <u>www.mdlindia.co.in</u> ("Site"), including emails and newsletters sent by MDPL to you. This Privacy Policy shall be read in conjunction with Terms of Use available at <u>www.mdlindia.co.in</u>

MDPL is committed to protecting the privacy of Your personal information of which has been provided to us or collected by us when you access our website. Our Privacy Policy is designed and developed to understand the privacy and security of your personal information.

This Privacy Policy explains the collection, use, protection, disclosure, sharing and transfer, if any, of "personal information" by MDPL. The Company reserves its right to amend this Privacy Policy from time to time based on changes as per the business, legal and regulatory requirements, and applicable laws and the same shall be updated on the Site. You are encouraged to periodically visit this page to review the policy and any changes. By using/accessing our Site or our products/services or otherwise providing information to us through this Site, you expressly consent that your personal information may be used and handled as described in this Privacy Policy.

This Privacy Policy is subject to changes as per applicable laws and regulations and shall stand amended from time to time.



## **Definition of Personal Information**

#### **Personal Information includes:**

Personally Identifiable Information (hereinafter referred to as PII): "Personally Identifiable Information" is information that is about, or can be related to, an identifiable individual. It includes any information that can be linked to an already identified individual or used to directly or indirectly identify an individual. Personal information does not include information that is anonymous, aggregated, or is no longer identifiable to a specific person.

Sensitive Personal Data or Information (hereinafter referred to as SPDI): "Sensitive Personal data or Information" means personal information which is more sensitive in nature viz. email id, mobile number etc. or any other data categorized as sensitive personal data as per the applicable laws.

For the purposes of this Privacy Policy, sensitive personal data or information has been considered as a part of Personal Information. This Privacy Policy describes the Personal Information which we may collect and our approach towards handling or dealing with the same. This Privacy Policy is provided for your information and is not intended to limit or exclude your rights under laws and regulations applicable in India.

Please read the following statement to learn about our information gathering and dissemination practices.

**Note:** By accessing/using this Site you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree please do not use or access our Site. By accessing and using the Site, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy.

#### 1. Collection of Personally Identifiable Information and other Information

When you subscribe, to and use/access our Site, if you provide us with your name, email address, and other information ("Personal Information"). We may collect and store your Personal Information which is provided by you from time to time. Our primary goal in doing so is to provide you with a safe, efficient, smooth, and customized experience. This allows us to provide services and features that most likely meet your needs, and to improve our Site so as to make your experience safer and easier.

When you access our Site, we may collect device related information pertaining to your mobile phone/laptop or any other device including, but not limited to, the type of mobile device you use, your mobile device's unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use ("Automatically Collected Information"). Once you give us your Personal Information, you are not anonymous to us.

We may automatically track certain information about you based upon your usage of our Site. We use this information to do research on our users' demographics, interests, and behaviour to better understand, protect and serve our users. This information is compiled and analyzed on an aggregated basis. This information may include the information, content, data, and other information you have viewed on the Site, your mobile phone



information, and your IP address. We collect data about your usage on the site, application, and platform, to help analyse our page flow, measure promotional effectiveness. The analysis of this data can also help us provide information that is targeted to your interests.

If you choose to post messages on our message boards, chat rooms or other message areas or leave feedback, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Site, we may collect such information into a file specific to you.

By virtue of you accessing the Site, we are provided with a unique advertising identifier for advertising and user analytics purposes. We may use the advertising identifier and/or a MDPL unique identifier in connection with the information collected in accordance with the terms of this Privacy Policy. This Privacy Policy governs use of all data collected by us irrespective of whether any third party/platform has amended its policies from time to time including any periodical control by such third parties on collection of data on your preference.

#### 2. Use of Personal Information

The information that we collect from you is held in accordance with applicable laws and regulations in India. It may be used by us for a number of purposes connected with our business operations and functions. We may use this information to contact you regarding matters relevant to the underlying service provided. Further we may use and analyze your personal information for various lawful purposes and enrichment of service experience. If required for business and to provide better services to you, we may acquire your information from our business partners and third parties (during our business association with them), while you are availing their service through us or accessing/using the Site.

The purposes for which your personal information may be used includes, but is not limited to:

- (i) Provide, maintain, and improve our products and services.
- (ii) Verify your identity as mandated by laws and regulations.
- (iii) Process your Subscription request.
- (iv) Keep you informed about new products and services unless you do not want to receive our marketing messages.
- (v) Data Analytics that help us get valuable insights to enhance customer experience as well as improve upon service delivery.
- (vi) Provide the relevant service or product to you, and to contact you with service-related messages about changes to the service or product.
- (vii) Contact you with offers or promotions based on how you use our products and services (unless you have asked us not to contact you).
- (viii) Respond to any questions or concerns that you may have about our products or services.
- (ix) Carry out research and statistical analysis and monitor customer use of our network, products, and services on an anonymous or personalized basis.
- (x) Carry out any activity in connection with a legal, governmental, or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection, or prosecution.
- (xi) Carry out activities connected with the running of our business such as personnel training, quality control, testing and maintenance of our products and services.
- (xii) Other usages that you may consent to.



MDPL will retain your information for as long as we have to by law and as per directions of the regulatory & law enforcement authorities. If there is no legal requirement, we will only store your information for as long as we have the justified business requirement and we need it for providing services to you. After that, the Company will destroy it by making it unreadable or undecipherable.

#### For internal record-keeping purposes.

Required to periodically send promotional emails to the email address provided by you voluntarily regarding any other information about us you may find interesting.

The above list contains examples of the type of data collected and is not a comprehensive list of every single data element.

If our information practices change regarding information previously collected, we shall make reasonable efforts to provide notice and obtain consent of any such uses as may be required by law.

### 3. Use of Demographic / Profile Data / Your Information

We use personal information to provide the data you request. To the extent we use your personal information to market to you, we will provide you the ability to opt-out of such uses. We use your Personal Information to resolve disputes, troubleshoot problems, help promote a safe service, measure consumer interest in specific programmes and channels, inform you about online and offline offers, products, services, and updates, customize your experience, detect, and protect us against error, fraud, and other criminal activity, enforce our terms and conditions, and as otherwise described to you at the time of collection.

In our efforts to continually improve our product and service offerings, we collect and analyse demographic and profile data about our users' activity on our Site. We identify and use your IP address to help diagnose problems with our server, and to administer our Site. Your IP address is also used to help identify you and to gather broad demographic information.

We will occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like pin code, age, or income level). We use this data to tailor your experience of our application, providing you with content that we think you might be interested in and to display content according to your preferences.

#### 4. Sharing of Personal Information

We may share Personal Information with our other corporate entities and affiliates/ business affiliates to help detect and prevent identity theft, fraud, and other potentially illegal acts; correlate related or multiple accounts to prevent abuse of our services; and to facilitate joint or co-branded services that you request where such services are provided by more than one corporate entity.

We may disclose Personal Information if required to do so by law or in the good faith belief that such disclosure is reasonably necessary to respond to court orders, or other legal process. We may disclose Personal Information to law enforcement offices, third party rights owners, or others in the good faith belief that such disclosure is reasonably necessary to: enforce our Privacy Policy; respond to claims that an advertisement, posting, or other



content violates the rights of a third party; or protect the rights, property or personal safety of our users or the general public. We and our affiliates will share / sell some or all of your Personal Information with another business entity should we (or our assets) plan to merge with, or be acquired by that business entity, or re- organization, amalgamation, restructuring of business. Should such a transaction occur that other business entity (or the new combined entity) will be required to follow this Privacy Policy with respect to your Personal Information.

We may need to contact you to comply or co-operate with a legal request. For this purpose, we shall use the email address provided to us by you. All communications sent by us at such email address shall be - provide web links to third party websites/applications/advertisements. However, this Privacy Policy does not apply to any information/data you may provide while visiting such third-party websites/applications/advertisements. We encourage you to carefully read the privacy policies on those third-party websites/applications/advertisements, before providing any of your personal/sensitive information.

#### 5. Security Precautions

The security of your Personal Information is important to us at MDPL. Hence, we follow industry accepted standards to protect your sensitive Personal Information.

MDPL adopts reasonable security practices and procedures to include, technical, operational, managerial, and physical security controls in order to protect your Personal Information from unauthorized access, or disclosure while it is under our control.

We have stringent security measures in place to protect the loss, misuse, and alteration of the information under our control. Whenever you change or access your account information, we offer the use of a secure server. Once your information is in our possession we adhere to strict security guidelines, protecting it against unauthorized access. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we try our best to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. We assume no liability for any disclosure of data due to errors in transmission, unauthorized third-party access, or other acts of third parties, or other acts or omissions.

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic, and managerial procedures to safeguard and secure the information and data stored on our system.

We have security teams who constantly review and improve our measures to protect your Personal Information from unauthorized access, accidental loss, disclosure, or destruction.

Our security practices and procedures limit access to Personal Information on a need-to-know basis. Further, our employees, to the extent they may have limited access to your Personal Information on a need-to-know basis, are bound by MDPL confidentiality policies which obligate them to protect the confidentiality of your Personal Information.

We take steps to ensure that our contracted third parties adopt reasonable level of security practices and procedures to ensure security of personal information. We cannot protect any information that you make available to the general public in any publicly accessible area of our website or any other media.



When we dispose of your Personal Information, we use reasonable procedures to erase it or render it unreadable.

No data transmission over the Internet is completely secure and for reasons outside of our control, security risks may still arise. Any Personal Information transmitted to us or from our online products or services will therefore be at your own risk. However, we will strive to ensure the security of your information. We observe reasonable security measures to protect your Personal Information against hacking and virus dissemination. However, our obligation to report or respond to any security breach under this section is not an acknowledgement by us of any fault or liability with respect to the security incident.

In case of any concerns kindly contact us.

#### 6. Choice/Opt-Out

Subject to our policy regarding collection of data under any MDPL identifier we provide all users with the opportunity to opt-out of receiving non-essential (promotional, marketing-related) communications from us on behalf of our partners, and from us in general, after setting up an account. You can stop all collection of information by writing to us at the registered address mentioned in section 17 hereinbelow. We will remove all your information, data, preferences, account details etc., but we may retain information/data about you for the purposes authorized under this Privacy Policy, unless prohibited by law. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Site or to comply with legal obligations.

If you would like to remove your contact information from all MDPL lists and newsletters, please write to us at the registered address mentioned in section 17 hereinbelow, to unsubscribe.

#### 7. Advertisements on MDPL

We may use third-party advertising companies to serve ads when you use our Site. These companies may use information (not including your name, address, email address, or mobile number) about your visits to this and other Applications or websites in order to provide advertisements about goods and services of interest to you.

Information pertaining to you collected by such third party will be governed by such platform's policies which are not under our control.

#### 8. Data Retention, Managing Your Information

We will retain your data as per applicable laws and for as long as you use the Site and for a reasonable time thereafter. If you'd like us to delete your information that you have provided via the Site, please contact us and we will respond within a reasonable period of time. Please note that some or all of the user provided data may be required in order for the Site to function properly.



#### 9. Your Consent

By using/ accessing our Site and/ or by providing your information, you consent to the collection and use of the information you disclose on the Site in accordance with this Privacy Policy, including but not limited to your consent for sharing your information as per this Privacy Policy.

#### 10. Children

Our Site is not intended for use by children under the age of Eighteen (18) or the prescribed age as per applicable laws of the country. We do not knowingly allow children under the age of Eighteen (18) to register for any service, and we do not knowingly collect any personally identifiable information from children under the age of Eighteen (18) or the prescribed age as per applicable laws of the country. If you become aware that a child has provided us with personal information without parental consent, please write to us at the registered address mentioned in section 17 hereinbelow. If we become aware that a child under Eighteen (18) has provided us with personal information without parental consent, we take steps to remove such information and terminate the child's account.

#### 11. Types of data collected

MDPL and its authorized Third Parties may collect information pertaining to your identity, demographics, and related evidentiary documentation. For the purposes of this document, a 'Third Party(ies)' is a service provider which is associated with MDPL and is involved in handling, managing, storing, processing, protecting, and transmitting information on behalf of MDPL. This definition also includes all sub-contractors, consultants and/or representatives of the Third Party.

The information we may collect about you will depend on our products and services you use and/or subscribe to. We may hold information relating to you that you have provided to us or that we may have obtained from another source such as our suppliers or from marketing organizations and credit agencies. We may also collect your Personal Information when you use our services, websites, and applications or otherwise interact with us during the course of our relationship.

The information we collect may include, but is not limited to, the following:

We may use cookies and other techniques, such as web beacons, to collect information about how you use our websites, and web-related products and services. This allows us to customize our website for you so that it is relevant to your interests and needs.

Your preferences for particular products, services, or lifestyle activities when you tell us what they are or when we assume what they are based on how you use our products and services.

Your contact with us, such as: a note or recording of a call you make to our contact centres, an email or letter you send to us and other records of any contact you have with us.

Sensitive and Personal Information provided by you implies your consent for its use by MDPL. These metrics are viewed in aggregate through Google Analytics. In accordance with Google Analytics policy metrics shall not include personally identifiable information.



#### 12. Access to Your Information

You have a right to request a copy of the information we hold on you at any time. Please write to us at the registered address mentioned in section 17 hereinbelow if you would like to receive a copy of this information.

#### 13. Severability

If any of the terms contained herein shall be deemed invalid, void, or for any reason unenforceable, that term or condition shall be deemed severable and shall not affect the validity and enforceability of any remaining terms.

#### 14. Governing Law and Jurisdiction

This Privacy Policy shall be governed by and shall be construed in accordance with the laws of India. Courts in Mumbai shall have exclusive jurisdiction in respect of all the terms, conditions and disclaimers contained in this Privacy Policy.

#### **15. Contact Information**

We strive to keep our records updated with your latest information. To this end, if you see any discrepancy in your Personal Information or if a part of your personal information changes, we request you to write to us at the registered address mentioned hereinbelow and communicate the change(s) for updating our records.

If you have any feedback or concerns regarding protection of your information, please contact us at: Address: 4<sup>th</sup> floor, Valencia Tower, 61, Dr. SS Rao Road, Parel East, Mumbai - 400 012. Contact No: +91 22 41048800

Please note that MDPL reserves the right to amend / alter / modify and /or make changes to the Site and this Privacy Policy at any time, without notice, and in its sole discretion and as needed based on change in technology, laws, rules, and regulations both national and international as may be applicable, orders and instructions from judicial, quasi-judicial, administrative authorities. Therefore, you should review the Privacy Policy periodically. Any changes to this Privacy Policy shall be effective upon posting, and your continued use of the Site after we make any such changes constitutes your binding acceptance of those changes.