

We appreciate & value the trust that you have placed on us. Our Privacy & Data Recovery policy demonstrates our commitment to the privacy of the users for our Site (www.konnxt.com and its allied sites) and BUZZ App (Android, iOS, Windows app, & any other product owned by KONNXT PRIVATE LIMITED). Please read the following to learn more about our Privacy and Data Recovery policy, and how we treat personally identifiable information collected from our visitors and users.

Please note that by visiting this Site or using BUZZ App you agree to be bound by the terms and conditions of this Privacy and Data Recovery Policy which is a legally binding agreement between you and us, KONNXT PRIVATE LIMITED, the owner of the Site & BUZZ App ("Company"). If you do not agree, please do not use or access this Site or BUZZ App. By mere use or access of the Site or BUZZ App, you expressly consent to our use and disclosure of your personal information in accordance with this Policy. This Policy is incorporated into and subject to the Terms of Use.

PRIVACY & DATA RECOVERY POLICY

Of

KONNXT PRIVATE LIMITED

This Privacy and Data Recovery policy (herein after referred to as the Policy) has been framed and is being issued herewith for implementation in the Company. The Policy sets forth to enforce the entire Privacy and Data Recovery framework & it's governance in the Company. Here the intent of the Policy is to enhance Confidentiality, safety, security, efficiency in processes, data exchange and recovery involving leadership support, organizational structure and strategy through well-defined responsibilities of the Board & executive management

OBJECTIVES

- *To provide Security oriented services and support to facilitate innovative use of technology for better company's decision making and for providing better services to the Subscribers*
- *More and More Integration of security and recovery of Data into the operation and other functions in line with the overall business objectives of the company*
- *Provide infrastructure to application subscribers through a more secured platform, cyber security, personalized and timely access of information, services and support.*
- *Clearly Defining Roles and responsibilities of the company's board, management and its customers in enabling corporate governance, leadership support, organizational structure to ensure Information systems sustains and extends strategies to achieve overall objectives.*

SCOPE AND MANDATE

The Mandate of the policy is to set out Company's approach towards its own information security management systems.

The documents in the Privacy Systems Policy apply to all information and assets which are owned by the company irrespective of any form, used by the company for business or any other purposes or which are connected to any networks managed by the company.

The documents in the Privacy systems Policy set apply to all subscribers of the company and any other individual who may process information on behalf of the company.

The scope of the Privacy Systems Policy is concerned with the management and security of the company's information assets and the use made of the assets by its employees and other individuals who may legitimately process company's information on its behalf.

This policy and the Framework apply to:

- (a)** Anyone Individual within the company who accesses company's information assets or technology. This includes employees or any other Individual
- (b)** Technologies or services used to access or process company's Information assets
- (c)** Information assets processed in relation to Government, regulators or any other entity's activity or function, including by, for, or with, external parties
- (d)** Information assets that are stored by the company or an external service provider on behalf of the company
- (e)** Information that is transferred from and/or to the government, Regulators or any other entity for a functional purpose
- (f)** 3rd party, public civic or other information that the company stores, curates or uses on behalf of another party
- (g)** Internal and/or external systems that are used to process, transfer or store company's information

PART 1

WHAT THIS PRIVACY POLICY COVERS?

This privacy policy covers treatment of personally identifiable information collected by this Site and BUZZ App

1. Collection and Use of Personal Information

a) While using BUZZ app, we would collect & store following information:

I. Email Addresses

We automatically read & collect your email addresses available on your phone. We need email addresses to send you email for updates, Invoices & other communications. We do not share this with any third parties.

- II. Phone Number
We collect phone number only when you explicitly give it to us. This is needed to alert text messages etc. Phone Number is also needed for unique identity to help us give you BUZZ points in your BUZZ closed wallet within the app.
 - III. SMS or Message Logs
We may store the log of all the SMS sent to a you on behalf of the Buzz app or Konnxt Pvt Ltd on our server to notify you with status changes or to inform you about other services.
 - IV. Device ID
We may store your device id such as IMEI number to help us uniquely identify you. This is needed as many users carry more than one devices to access BUZZ app
 - V. GPS location & City
We may track your current GPS location & city to offer you personalized news & information such as other BUZZ users around your location.
 - VI. Device Make, operator name
We collect device type for you to optimize certain features for your device type
 - VII. Network type
We may collect this information as few network types behave differently at times
 - VIII. Operating System Version Code & Version Name
We may collect operating system version name & version code to optimize certain features for your OS version
 - IX. App Version code and app version name
We may collect app version code and app version name to help support you better.
2. The data should be collected in the format for **Signup**. The above information may also be used for internal analysis on our users' demographics, interests, and behavior patterns to help us better understand, protect and serve our users. This information

is analyzed on an aggregated basis. *(An extract of data collection procedure is presented in scenario 1)*

None of this information is shared with any third parties & may be periodically deleted from our servers when not needed. Provided Company do shares data with third party for advertisement and usage purposes all routine but does not discloses sensitive information like name and buzz-name. But other information is shared among backend advertisers.

3. You can visit the Site without revealing any personal information. However, once you register yourself to avail our services, you will be sharing your personal information with us. This helps us provide you a safe and customized experience on our site. We may automatically track certain information about you based upon your behavior on our Site.
4. For users accessing our Site, the information collected may include the source URL, destination URL, your operating system, device, browser information, and your IP address. We use data collection devices such as "cookies" on certain pages of the Site to help analyze our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on your hard drive that assist us in providing our services. We offer certain features that are only available through the use of a "cookie". We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your hard drive at the end of a session. Additionally, you may encounter "cookies" or other similar devices on certain pages of the Site that are placed by third parties. We do not control the use of cookies by third parties
5. If you choose to transact on the Site or the BUZZ App, we may collect information about your web behavior, such as your mobile number, your personal information which user have shared, a credit / debit card number and a credit / debit card expiration date and/ or other payment instrument details.
6. **Information Sharing and Disclosure**
We do not share any of your personal information to any third parties. We may disclose your personal information to affiliates who work with us to provide products and services requested by you. We will share personal information for these purposes only with affiliates whose privacy policies are consistent with ours or who agree to abide by our policies with respect to personal information. We may

otherwise disclose your personal information when: We have your express consent to share the information for a specified purpose. We need to respond to subpoenas, court orders or such other legal process. We need to protect the personal safety of the users of our Site, BUZZ app or defend the rights or property. We find that your actions on our Sites violate the Terms of Use document or any of our usage guidelines for specific products or services.

7. BUZZ App Privacy Policy

This Privacy Policy describes the policies and procedures of KONNXT PRIVATE LIMITED (“BUZZ”) on the collection, use and disclosure of your information when you use the BUZZ Application on your mobile phone. BUZZ app collects and uses information as described in "Collection and Use of Personal Information" section. We will not use or share your information with anyone except as described in this Privacy Policy. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources. The terms "we", "us", and “our website” refer to BUZZ App or www.konnxt.com or buzz.konnxt.com and the terms "you" and "your" refer to you, as a user of one of our services. The term "personal information" means information that you provide to us which personally identifies you to be contacted or identified, such as your name, phone number, email address, and any other data that is tied to such information.

8. How We Share Your Information

a) Personally Identifiable Information:

- I. KONNXT PRIVATE LIMITED (BUZZ) may share your personally identifiable information with affiliates for the purpose of providing the Service to you or with affiliates offering combined services with us. If we do this, such affiliates use of your information will be bound by this Privacy Policy. We may store personal information in locations outside our direct control (for instance, on servers or databases co-located with hosting providers). We may share or disclose your information with your consent, such as if you choose to sign on to the Service through a third-party service on our Site. KONNXT PRIVATE LIMITED (BUZZ) may disclose your personal information if required to do so by law or summon or if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect our rights or property.

b) Non-Personally Identifiable Information

- I. We may aggregate and/or anonymize information collected through the Service so that the information does not identify you. We may use aggregated, anonymized, and other non-personally identifiable information

for any purpose, including for research and marketing purposes, and our use and disclosure of such information is not subject to any restrictions under this Privacy Policy.

- II. KONNXT PRIVATE LIMITED (BUZZ) may allow third-party ad servers or ad networks to serve advertisements on the Service and on third-party services. These third-party ad servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on our property. They automatically receive your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or web beacons) to measure the effectiveness of their advertisements and to personalize the advertising content. KONNXT PRIVATE LIMITED (BUZZ) does not provide any personally identifiable information to these third-party ad servers or ad networks without your consent. However, please note that if an advertiser asks KONNXT PRIVATE LIMITED (BUZZ) to show an advertisement to a certain audience and you respond to that advertisement, the advertiser or ad server may conclude that you fit the description of the audience they are trying to reach. The KONNXT PRIVATE LIMITED (BUZZ) Privacy Policy does not apply to, and we cannot control the activities of, third-party advertisers. Please consult the respective privacy policies of such advertisers for more information.

9. Advertising

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

10. Consent

By using the 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.

11. Security

Unfortunately, no data transmission over the Internet can be considered 100% secure.

However we use industry-standard encryption to protect data transmissions. We also safeguard your personal information from unauthorized access, through access control procedures, network firewalls and physical security measures.

PART II

DATA BACKUP FRAMEWORK

It is the policy of the company to define the backup process for computers / Laptops and other electronic device within the company, which are expected to have their data backed up. The policy is designed to protect company's data and to ensure that it can be recovered in the event of an equipment failure, intentional destruction of data, or disaster. This policy applies to all information, critical systems and their data owned and operated by the organization.

12. Certain Basic Concepts

- a) **Backup** The saving of files onto magnetic tape or other offline mass storage media for the purpose of preventing loss of data in the event of equipment failure or destruction

- b) **Archive** The saving of old or unused files onto magnetic tape or other offline mass storage media for the purpose of releasing on-line storage room

- c) **Restore** The process of bringing off line storage data back from the offline media and putting it on an online storage system such as a file server.

d) **Timing**

Full back up is performed monthly on the last week of the month. If for public holiday/maintenance reason, backups are not performed. They are done on next working day.

(a) **Cloud Storage**

Cloud Storage - Backups are performed on Storage service as provisioned on "Amazon Web Services " - please refer to the privacy policy of AWS and Amazon on <https://aws.amazon.com/privacy/> and all data stored and interactions will be maintained on Mongo DB Atlas please refer to the privacy policy for the same on <https://www.mongodb.com/legal/privacy-policy>.

(b) **Cloud Storage Cleaning**

Cloud Storage cleaning will be done on a monthly basis within the 10th day of the following month. In case of emergency situation cleaning is done as soon as possible for the CIO and the concerned team.

(c) Monthly Backups

The last week backup tape of every month shall be stored at company's registered office. Further Backup shall be stored on AWS (any one)

(d) Responsibility

The CIO / IT Administrator or delegate a member of the Information Technology (IT) department should perform regular backups. The IT department shall test the ability to restore data from backups.

(e) Testing

The ability to restore data from backups shall be tested at least on a monthly/quarterly cycle as per direction of the CIO

(a) Data Backed Up

Data to be backed up include the following information:

- i SignUP Details (as specified below)
- ii Live Location Details (GPS data)
- iii Messages and Chat Logs
- iv FrontEnd and Backend Codebase including the database
- v Mail archive
- vi Legacy Application database

(b) Restoration

Users that need files restored must submit a request to the help desk. That includes information about the files, folder and its path with reason - As is

(c) Data Retention

Monthly Data backed up on backup tapes to be retained for Eight years unless specifically directed by the CAB

Explanation – In case of day to day routine activities in relation to Data backup the ultimate competent authority will be any of the executive Director

13. Changes to this Privacy Policy

We may at any time, without notice to you and in its sole discretion, amend this policy from time to time. Please review this policy periodically. Your continued use of this Site after any such amendments signifies your acceptance thereof.

14. Grievance Officer

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below –

SOHAM GAIN
135-N, KARUNAMOYEE GHAT
RD REF-C.PYNE 3/5/12
KOLKATA WB 700082

15. Questions or Suggestions

If you have questions or suggestions about this privacy policy, or your own personal information, please e-mail us at buzzofficial@konnxt.com

SCENARIO 1

Information Collected when SIGNUP

- **Phone Number**
Google / Facebook Login (through Google and Facebook, company only gets authentication notice)
- **Name**
- **Date of Birth**
- **Profile Picture (From Phone Storage after asking for user permission)**
- **Location of the User(With User Permission , not disclosed to anyone)**

[We take data in the format for matching:

User activity on the app (Whichever options they choose and screen time, usage activity: Matching preference, Buzz line, Profile updating Places where user is most active Download and deletion of the application)]

Each user has access to each user's profile section which contains:

- **Buzz name**
- **Age**
- **Bio**
- **Location (City & Country)**
- **Profession and Interests**

[Company holds rights to use User data keeping their sensitive information intact for Company related activities for Curating Services Channelizing Advertisement]