T-CLOUD / SMARTRON AND AFFILIATE COMPANIES

PRIVACY POLICY

VER 2.2

AUTHOR: RUDRA PRATAP E ON 23RD APRIL 2020

EFFECTIVE FROM:

AUGUST 20TH, 2020

Privacy Policy:

'SMARTRON' PRIVACY POLICY

This Privacy Policy ("**Policy**") describes the policies and procedures on the collection, use, disclosure and protection of your information when you use Smartron Devices/ Smartron Services, made available by Smartron India Private Limited ("**Smartron**", "**Company**", "**we**", "**us**" and "**our**"), a private company established under the laws of India having its registered office at **Smartron India Private Limited, 9th Floor, 2-48/5/6, Opp. RTTC, Telecom Nagar Extension, Gachibowli, Hyderabad, Telangana 500032.**

The terms "you" and "your" refer to the user of the Smartron Devices/ Smartron Services. The term "**Services**" refers to any services offered by Smartron whether on the Smartron Devices/ Smartron Services.

Please read this Policy before using the Smartron Devices/ Smartron Services or submitting any personal information to Smartron. This Policy is a part of and incorporated within, and is to be read along with, the Terms of Use.

By using the Smartron Devices/ Smartron Services, you consent to the collection, processing, and use of information from or about you as explained in this Privacy Policy. You can always choose not to provide certain information to us as further explained herein, but this may limit your ability to take full advantage of the many features we offer. **If you do not consent to the collection and use of information from or about you in accordance with this Privacy Policy, then you must not access or use the Services.**

When you use our services, you're trusting us with your information. We understand this is a big responsibility and therefore, work hard to protect your information and put you in control.

This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information.

We build a range of services that help millions of people daily to explore and interact with the world in new ways.

Your relationship with 'Smartron'

These terms help define the relationship between you and 'Smartron'. Broadly speaking, we give you permission to use our services if you agree to follow these terms, when we speak or refer to 'Smartron' (t-cloud by Smartron)", "we," "us," and "our," we mean 'Smartron India Private Limited' and all of its affiliates, including any local entities / subsidiaries based in India and abroad.

We provide a broad range of services that are subject to these terms, including:

- apps (like t-home, tronX, tronX bike, tronX mobility, t-cloud, t-pay and t-health)
- platforms (like 'MaYa', 'Smartron', 'tronX' and 't-store')
- integrated services (like third party provided billing, booking and streaming services – embedded in other companies' apps or sites)
- devices and appliances (like wireless / smart switchboards, sensors, cameras and other associated devices for both home and commercial installations)

Our services are designed to work together, making it easier for you to move from one activity to the next across different devices.

You can use our services in a variety of ways to manage your privacy. For example, you can sign up for a 'Smartron' Account if you want to create and manage content like emails and photos, or see more relevant search results.

INFORMATION 'SMARTRON' COLLECTS:

We want you to understand the types of information we collect as you use our services

We collect information to provide better services to all our users — from figuring out basic stuff like which language you speak, to more complex things like which ads you'll find most useful, the smart devices you use in your home and are connected to our platform, your health parameters from t-health devices, the data from your tronX bikes and vehicles, your voice commands being executed for subsequent actions among others. The information 'Smartron' collects, and how that information is used, depends on how you use our services and how you manage your privacy controls.

When you're not signed in to a 'Smartron' Account, we store the information we collect with unique identifiers tied to the browser, application, or device you're using. This helps us do things like maintain your language preferences across our services and so on.

When you're signed in, we also collect information that we store with your 'Smartron' Account, which we treat as personal information. Personal Information is the information that can be associated with a specific person and could be used to identify that specific person whether from that data, or from the data and other information that we have, or is likely to have access to. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

We collect the aforesaid information directly from you when you provide it to us and/or automatically as you navigate through our Services (information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies). Please refer to 'Information we collect as you use our services' for further clarity.

PERMISSIBLE AGE

The 'Smartron' services are not intended for users under the age of 18, unless permitted under applicable local laws (Permissible Age). We do not knowingly collect any personal information from users or market to or solicit information from anyone under the Permissible Age. If we become aware that a person submitting personal information is under the Permissible Age, we will delete the account and any related information as soon as possible.

Things you create or provide to us

When you create a 'Smartron' Account, you provide us with personal information that includes Your full name, email address, postal code, password and other information you may provide with your account, such as your gender etc. You can also choose to add a phone number or payment information to your account. Even if you aren't signed in to a 'Smartron' Account, you might choose to provide us with information — like an email address to receive updates about our services.

By virtue of storing your content (for brevity, content shall also mean all such information provided by you for the purposes of availing our services which shall not be limited to user actions such as routines/ schedules and automated protocols in home/ health/ infra segments, and further storing videos/ images/documents on the t- cloud) and actions to enable interactions between the user, our devices and our cloud services, we also collect the content you create, upload, or receive from others when using our services. This includes things like, photos and videos you save, docs and spreadsheets you create **and upload**, and comments you make on our community forums.

We also collect your browsing information, particularly how long you used our services and which features you used.

We may also collect your transactional information in the event you access our integrated services (like third party provided billing, booking and streaming services – embedded in other companies' apps or sites) including (but not limited to) your phone number, address, email, billing information and credit or payment card information. This information may be shared with third-parties which assist in processing and fulfilling your requests.

Information we collect as you use our services:

We may automatically collect certain information about the computer or devices (including mobile devices) you use to access the Services, and about your use of the Services, even if you use the Services without registering or logging in.

Your apps, browsers & devices

We collect information about the apps, browsers, and devices you use to access 'Smartron' services, which helps us provide features like automatic product updates and dimming your screen if your battery runs low.

The information we collect includes unique identifiers, browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.

We collect this information when a 'Smartron' service on your device contacts our servers — for example, when you install an app from the Play Store or when a service checks for automatic updates. If you're using an Android device with 'Smartron' apps, your device periodically contacts 'Smartron' servers to provide information about your device and connection to our services. This information includes things like your device type, carrier name, crash reports, and which apps you've installed.

We collect information when you use our Service or view our advertising outside of our Service. We may also collect information from or about the computers, phones, tablets, or other devices where you access our Services, depending on the permissions you've granted. Examples of this information may include your IP address, device ID number, browser and software characteristics (such as type and operating system or language settings), activity on our Services including information about the Content you view on our Services (e.g. audio titles,

video titles and categories), the frequency and duration of your activities, page views, ad data, referral URLs, network state, and carrier information.

Your activity:

We collect information about your activity in our services, which we use to do things like automatically turning on lights when you come home! The activity information we collect may include:

- Terms you search for
- Views and interactions with content
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services

If you use our services to make and receive calls or send and receive messages, we may collect telephony log information like your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls.

Your location information:

We collect information about your location when you use our services, which helps us offer features like driving directions for your weekend getaway or showtimes for movies playing near you.

Your location can be determined with varying degrees of accuracy by:

- GPS
- IP address
- Sensor data from your device
- Information about things near your device, such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect depend in part on your device and account settings. For example, you can turn your Android device's location on or off using the device's settings app.

In some circumstances, 'Smartron' also collects information about you from publicly accessible sources.

We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs.

WHY 'Smartron' COLLECTS DATA

We use data to build better services

We use the information we collect from all our services for the following purposes:

Provide our services:

We use your information to deliver our services, like processing the terms you search for in order to return results or helping you share content by suggesting recipients from your contacts.

Maintain & improve our services:

We also use your information to ensure our services are working as intended, such as tracking outages or troubleshooting issues in our apps that you report to us. And we use your information to make improvements to our services.

Develop new services

We use the information we collect in existing services to help us develop new ones.

Measure performance:

We use data for analytics and measurement to understand how our services are used. For example, we analyze data about your visits to our sites to do things like optimize product design. And we also use data about the ads you interact with to help advertisers understand the performance of their ad campaigns. We use a variety of tools to do this, including 'Smartron' Analytics. When you visit sites that use 'Smartron' Analytics, 'Smartron' and a 'Smartron' Analytics customer may link information about your activity from that site with activity from other sites that use our ad services.

Communicate with you

We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, like an attempt to sign in to your 'Smartron' Account from an unusual location. Or we may let you know about upcoming changes or improvements to our services. And if you contact 'Smartron', we'll keep a record of your request in order to help solve any issues you might be facing.

Protect 'Smartron', our users, and the public

We use information to help improve the safety and reliability of our services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm 'Smartron', our users, or the public.

We use different technologies to process your information for these purposes. And we analyze your content to help us detect abuse such as spam, malware, and illegal content. We also use algorithms to recognize patterns in data.

We may combine the information we collect among our services and across your devices for the purposes described above. Depending on your account settings, your activity on other sites and appsmay be associated with your personal information in order to improve 'Smartron''s services and the ads delivered by 'Smartron'.

If other users already have your email address or other information that identifies you, we may show them your publicly visible 'Smartron' Account information, such as your name and photo. This helps people identify an email coming from you, for example.

If you are availing Services, which would require you to pay, we use billing information, such as your billing address or payment methods to help provide the monetization features of our Services. For example, we use billing information to process payments to a Partner (using a third-party payment vendor), to retrieve account information for a Partner, and to detect abuse of our Services.

In order to access certain services from your mobile device, you may be required to share with us your device's location data. In addition to providing you with certain services, this also enables us to render services to you.

In addition to any personally identifiable data use that is described in this Privacy Policy, we may aggregate information about you and other individuals together, or otherwise "de-identify" the Data about you (meaning that the data is anonymized and aggregated so it no longer personally identifies you). We may use this "de-identified" information for any legitimate internal and external business purpose, including for research and analysis, administration of our Services, own apps-based advertising and business promotional purposes.

We use the information we have to help verify accounts and activity, and to promote safety and security on and off our Services, such as by investigating suspicious activity or violations of our legal terms and policies. We work hard to protect your account using teams of engineers, automated systems and advanced technology such as encryption and machine learning.

We use the information we collect from and about you to also administer our services, provide you with customer support and carry out our obligations and enforce our rights arising from any contracts entered into between you and us.

We'll ask for your consent before using your information for a purpose that isn't covered in this Privacy Policy.

When you share your information

Many of our services let you share information with other people, and you have control over how you share. Remember, when you share information publicly, your content may become accessible through search engines.

When you're signed in and interact with some 'Smartron' services, your name and photo may appear next to your activity. We may also display this information in ads depending on your Shared endorsements setting.

When 'Smartron' shares your information

We do not share your personal information with companies, organizations, or individuals outside of 'Smartron' except in the following cases:

With your consent

We'll share personal information outside of 'Smartron' when we have your consent. For example, if you use 'Smartron' Home to make a reservation through a booking service, we'll get your permission before sharing your name or phone number with the restaurant. We'll ask for your explicit consent to share any sensitive personal information.

With domain administrators

If you're a student or work for an organization that uses 'Smartron' services (like G Suite), your domain administrator and resellers who manage your account will have access to your 'Smartron' Account. They may be able to:

- Access and retain information stored in your account, like your email
- View statistics regarding your account, like how many apps you install
- Change your account password
- Suspend or terminate your account access
- Receive your account information in order to satisfy applicable law, regulation, legal process, or enforceable governmental request
- Restrict your ability to delete or edit your information or your privacy settings

For external processing

We provide personal information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support.

For legal reasons:

We will share personal information outside of 'Smartron' if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process, or enforceable governmental request. We share information about the number and type of requests we receive from governments in our Transparency Report.
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of 'Smartron', our users, or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our affiliates and partners — like publishers, advertisers, developers, service providers or rights holders. For example, we share information publicly to show trends about the general use of our services.

If 'Smartron' is involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

In order to access/use some of our services, such as to make payments, we may require credit or debit card account information. By submitting your credit or debit card account information through our services, you expressly consent to the sharing of your information with third-party payment processors, and other third-party service providers (including but not limited to vendors who provide fraud detection services to us and other third parties).

KEEPING YOUR INFORMATION SECURE

We build security into our services to protect your information

All 'Smartron' products are built with strong security features that continuously protect your information. The insights we gain from maintaining our services help us detect and automatically block security threats from ever reaching you. And if we do detect something risky that we think you should know about, we'll notify you and help guide you through steps to stay better protected.

We work hard to protect you and 'Smartron' from unauthorized access, alteration, disclosure, or destruction of information we hold, including:

- We use encryption to keep your data private while in transit
- We review our information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems

- We restrict access to personal information to 'Smartron' employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

We have implemented appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access to your information and to maintain data security. These safeguards take into account the sensitivity of the information that we collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. The third party service providers with respect to payment gateway and payment processing are all validated as compliant with the payment card industry standard (generally referred to as PCI compliant service providers).

We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your personal information secure. You should not share your user name, password, or other security information for your Smartron account with anyone. If we receive instructions using your user name and password, we will consider that you have authorized the instructions.

EXPORTING & DELETING YOUR INFORMATION

You can export a copy of your information or delete it from your 'Smartron' Account at any time

You can export a copy of content in your 'Smartron' Account if you want to back it up or use it with a service outside of 'Smartron'.

To delete your information, you can:

- Delete your content from specific 'Smartron' services
- Search for and then delete specific items from your account using My Activity
- Delete specific 'Smartron' products, including your information associated with those products
- Delete your entire 'Smartron' Account

RETAINING YOUR INFORMATION

We retain the data we collect for different periods of time depending on what it is, how we use it, and how you configure your settings:

- Some data you can delete whenever you like, such as the content you create or upload. You can also delete activity information saved in your account, or choose to have it deleted automatically after a set period of time.
- Other data is deleted or anonymized automatically after a set period of time, such as advertising data in server logs.
- We keep some data until you delete your 'Smartron' Account, such as information about how often you use our services.
- And some data we retain for longer periods of time when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.

When you delete data, we follow a deletion process to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. We try to ensure that our services protect information from accidental or malicious deletion. Because of this, there may be delays between when you delete something and when copies are deleted from our active and backup systems.

COMPLIANCE & COOPERATION WITH REGULATORS

We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.

Data transfers

We maintain servers around the world and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy. We also comply with certain legal frameworks relating to the transfer of data, such as the ones applicable in India.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

ABOUT THIS POLICY

The terms of use and this privacy policy shall constitute the entire understanding between you and Smartron. In the case of any inconsistencies with respect to any of the terms and conditions set forth in the terms of use or this privacy policy, such terms and conditions shall be harmoniously interpreted.

When this policy applies

This Privacy Policy applies to all of the services offered by 'Smartron' and its affiliates. This Privacy Policy doesn't apply to services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy doesn't apply to:

- The information practices of other companies and organizations that advertise our services
- Services offered by other companies or individuals, including products or sites that may include 'Smartron' services, be displayed to you in search results, or be linked from our services

Changes to this policy:

We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and we offer access to archived versions for your review. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes). Your use of Smartron Devices/Services after future amendments or changes in the Privacy Policy shall be deemed as your express acceptance to such amended/changed terms.

Third-Party Access Points, Devices, and Links

Our Services may be accessible through third-party websites, applications and other means of access operated by other companies (collectively, "Third-Party Access Points"). For example, you can access our Services through third-party websites where services are being availed from a third party application. Our Services also may contain links to third-party websites or applications. For example, if you click on an advertisement or a search result on our website, you may be taken to a website that we do not control. None of these Third-Party Access Points, devices, websites or applications are operated by Smartron, even if they contain our name or logo. As such, we are not responsible for the privacy practices of the operators of these Third-Party Access Points. Accordingly, we recommend that you independently review their privacy policies for further information.

Deleting Your Smartron Account

If you have an account with us you may choose to delete your Smartron account, in accordance with our Terms of Use , via the settings of your Smartron account when signed in. Please note that, after you delete your account, you will not be able to sign in to our website or access any of your personal information, however, you can open a new account at any time. If you delete your account, we may still retain some information from or about you in accordance with applicable law, including for various legal, operational, analytical, accounting, and auditing purposes. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

Applicable Law and Jurisdiction:

If you reside within Republic of India: you agree that any dispute between you and Smartron arising out of or relating in any way to this Privacy Policy or our collection, processing and/or use of your Data shall be interpreted in accordance with the laws of Republic of India, without reference to its conflicts of laws, and notwithstanding multiple defendants or third party claims. You also agree that any claim or dispute between you and Smartron shall be decided by a court of competent jurisdiction located in Hyderabad.

If you reside in any other country other than Republic of India: you agree that any dispute between you and Smartron arising out of or relating in any way to this Privacy Policy or our collection, processing and/or use of your Data shall be interpreted in accordance with the laws of the India, without reference to its conflicts of laws, and notwithstanding multiple defendants or third party claims. You also agree that any claim or dispute between you and Smartron shall be decided by a court of competent jurisdiction located in the Hyderabad.