

# Privacy Policy

## A. Contracting Parties

The following Terms and Conditions define the terms of Engagement between Nishtha Business Services Limited, trading as nReach (hereinafter also referred to as “Nishtha”, “nReach”, “Us”, “Our” or “We”), and the Client and/or Purchaser (hereinafter also referred to as “Client”, “Purchaser” or “You”), for the provision of products and services (Nishtha/nReach and the Client/Purchaser being collectively addressed as “parties”).

## B. Collection

1. Sources: We collect and use your Personal Information in accordance with this Privacy Policy. The sources of the information that we collect may include:
  - a. Information submitted on our websites.
  - b. Products/Services made available by Us.
  - c. Cookies.
  - d. Publicly available information.
2. Nature: The Personal Information We collect about you may include the following:
  - a. General identification and contact information, e.g.:
    - i. Name
    - ii. Address
    - iii. E-mail address
    - iv. IP address
    - v. Telephone number
    - vi. Gender
    - vii. Date of birth
  - b. Other sensitive information, e.g.:
    - i. Racial or Ethnic origin
    - ii. Criminal record.
  - c. Information enabling us to provide products and services, e.g.:
    - i. Age
    - ii. Location
  - d. Marketing preferences/events
  - e. Contest or Prize draws
  - f. Voluntary surveys
  - g. Aggregate Statistical information, e.g. site visitors and users
  - h. We may provide anonymous information to customers, advertisers, suppliers and other reputable third parties.
  - i. Information from Software applications and Publicly available information, e.g.:
    - i. Comments
    - ii. Message boards
    - iii. Blogs
    - iv. E-mails

## C. Legal Basis

1. **Consent:** In certain cases, We may process Your data with Your consent, e.g. when We send promotional material or when you link Your account to other third-party

accounts. You have the right to withdraw consent at any time. Where consent is the only legal basis for processing, we shall stop processing data after consent is withdrawn.

2. **Necessity:** We may process Your data without your explicit consent when it is necessary fulfil an agreement/obligation with you.
3. **Legitimate Interest:** We also process your data when it is in our legitimate interest to do so and when these interests are not overridden by your data protection rights. This may include:
  - a. Ensuring the security and integrity of Our Products/Services, and in ensuring that our websites and applications operate effectively;
  - b. Selling and Supplying Products/Services to our customers;
  - c. Protecting customers, employees and other individuals, and maintaining their safety, health and welfare;
  - d. Promoting, marketing and advertising Our Products/Services;
  - e. Sending promotional communications which are relevant and tailored to individual customers;
  - f. Understanding our customers' behaviour, activities, preferences and needs;
  - g. Improving existing Products/Services, and developing new Products/Services;
  - h. Handling customer contacts, queries, complaints or disputes;
  - i. Fulfilling our duties towards our customers, colleagues, shareholders and other stakeholders.
4. **Legal/Statutory Obligation:** We may process Your data to comply with Our legal and regulatory obligations, e.g. preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies.

#### D. Sharing

1. If You do not wish us to collect and share your Personal Information, please do not submit this information to Us.
2. **Our Associates:** When You submit any information to Us, Your information may also be shared with Our associates in accordance with this Privacy Policy. We shall remain responsible for the management and security of any such shared Personal Information that you have submitted to Us. Access to Personal Information within Us and our associates, is restricted to those individuals who have a need to access the information for our business purposes.
3. **Our Service Providers:** This includes external third-party service providers, e.g. accountants, auditors, experts, lawyers and other outside professional advisors; payment services providers; IT systems, support and hosting service providers; printing, advertising, marketing, market research and analytics service providers; document and records management providers; technical engineers; data storage and cloud providers and similar third-party vendors and outsourced service providers that assist Us in carrying out our business activities. Personal Information related to payment card and banking information is handled by Our third-party providers and will be subject to their privacy policies and terms of use. These should be available on their websites.
4. **Governmental Authorities/Agencies, Third Parties and Courts:** We may share Personal Information with governmental and other public authorities and/or agencies and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate:
  - a. to comply with applicable law, including laws outside Your country of residence;
  - b. to comply with legal process;

- c. to respond to requests from public and government authorities including public and government authorities outside Your country of residence;
  - d. to enforce Our terms and conditions;
  - e. to protect Our operations or those of any of Our associates;
  - f. to protect Our rights, privacy, safety or property, and that of Our group companies, You or others; and
  - g. to allow Us to pursue available remedies or limit our damages.
5. **Other Third Parties:** Sometimes, We may share Personal Information with other third parties. We shall always do this under agreement and in accordance with your instructions.

## E. Usage

1. We may use your Personal Information for some or all the following:
  - a. Communicate with You;
  - b. Send You important information regarding changes to Our policies, terms and conditions, features and functionalities available through the Website and Products/Services, and other administrative information;
  - c. Provide improved quality, training and security and manage other commercial risks;
  - d. Carry Out market research and analysis;
  - e. To understand and analyse customer engagement with Our Website, Products/Services, content and e-mails.
  - f. Provide marketing information to You (including information about other products and services offered by selected third-party partners), in accordance with preferences You have expressed;
  - g. Personalise your experience with the Website and software applications, e.g. presenting information and advertisements tailored to You and by providing You access to selected services of Our group companies;
  - h. Develop and improve Our Website, Products/Services (where possible we will collect anonymous information that is not directly identifiable to you);
  - i. Allow You to participate in contests, prize draws and similar promotions, and to administer these activities;
  - j. Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing, finance and accounting, billing and collections, IT systems; data and website hosting, business continuity, and records, document and print management;
  - k. Resolve complaints, and handle requests for data access or correction;
  - l. Comply with applicable laws and regulatory obligations (including laws outside your country of residence), e.g. anti-money laundering, anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside Your country of residence);
  - m. Establish and defend legal rights; protect Our operations or those of any of Our group companies or insurance business partners, Our rights, privacy, safety or property, and/or that of Our group companies, You or others; and pursue available remedies or limit our damages.

## F. Transfer/Storage

1. Personal Information which You supply to Us is generally stored and kept inside UK. However, due to the nature of Our global business and the technologies required, Your

Personal Information may be transferred to third party service providers outside UK, in countries where there may be a lower legal level of data protection.

2. In such situations, we transfer the minimum amount of data necessary, anonymously where possible, and enter legal agreements to aim to ensure these third parties handle Your Personal Information in accordance with this Privacy Policy and the levels of data protection mandated in UK.

## G. Managing Personal Information

1. When You access our website online, we store some information about You. This is anonymous and used for statistical purposes. When You create an account and log-in to Your account, it is protected by Your password and may only be accessed by You. You can manage the content and information in your Account at any time, by logging in.
2. You can de-activate or delete Your account at any time.
3. However, if you would like to permanently delete your account, you can contact us with the subject line “Permanently delete my information and account”. Please do not forget to tell us who you are.
4. It is important for You to protect against unauthorised access to Your password and to Your computers, devices, and applications. We strongly recommend that You sign-off/log out when You finish using a shared computer.

## H. Security

1. We are committed to keeping Your personal data safe and secure from unauthorised access to or unauthorised alterations, disclosure or destruction of information that we hold.
2. Our security measures include:
  - a. encryption of data;
  - b. reviewing Our information collection, storage and processing practices, including physical security measures;
  - c. restricting access to Personal Information to Our employees, contractors and agents who need to know that information in order to process it for Us and who are subject to contractual confidentiality and disciplinary consequences; and
  - d. internal policies setting out Our data security approach and training for employees.

## I. Advertising/Marketing

1. We may partner with third-party advertising networks so that We and other advertisers can display advertising which is more relevant to You and Your interests on Our Website or on other sites that You visit, and assess the performance of that advertising.
2. We and Our partners may utilise cookies or web beacons along with other codes such as Your device ID to better understand Your interests from the web pages You interact with and the search terms You use on Our site to build a picture of the category of interests or preferences You have, and to provide advertisements about Products/Services that may be of interest to You.
3. Our partners do not collect and do not have access to any information from which You can be directly identified such as Your name, address or e-mail. They may, however, anonymously track your internet usage across other websites in their networks beyond these sites. To learn more about the use of this information or to choose not to receive tailored advertising by opting out, you can visit either the Network Advertising Initiative at [www.networkadvertising.org](http://www.networkadvertising.org) or the European Interactive Digital Advertising Alliance

(EDAA) at [www.youronlinechoices.com](http://www.youronlinechoices.com). You can control the types of advertisements we display here. You can also learn more about our use of cookies and similar technologies and Your choices by reading Our Cookies Policy. Please note that even if You opt-out you will still continue to receive generic advertising that has not been targeted to You and Your interests.

4. We also use tracking pixels in Our marketing emails. These pixels tell us if and when You opened an e-mail from Us. We use this information to better understand how customers engage with Our content and to analyse the effectiveness of Our marketing campaigns. You can disable tracking pixels by changing Your e-mail settings to block the loading or display of external images.

## J. Your Rights

1. You enjoy the following rights:
  - a. the right to ask what personal data We hold about you at any time, subject to a fee specified by law;
  - b. the right to ask Us to update and correct any out-of-date or incorrect personal data that we hold about you free of charge; and
  - c. the right to opt out of any marketing communications that we may send to you, subject to the above.
2. If You wish to exercise any of the above rights, please contact us via e-mail.

## K. Children and Minors

1. The Website or Products/Services are not meant for use by individuals who have not completed 18 years of age. Individuals under the age of 18 years are expressly prohibited from using the Website or Products/Services.

## L. Third-party Privacy Policies

1. This Privacy Policy does not address, and We are not responsible for, the privacy, information or other practices of any third parties which the Website or Products/Services may link to. The inclusion of a link on the Website or Products/Services does not imply endorsement of the linked site or service by Us or Our associates.
2. We are not responsible for the collection, usage and disclosure policies and practices (including the data security practices), of other organisations or any other software application developer or provider, social media platform, operating system or wireless service provider, or device manufacturer, including any Personal Information you disclose to other organisations through or in connection with the Website, Products/Services or our social media Pages.

## M. Modification

1. We review this Privacy Policy regularly and reserve the right to make changes at any time to account for changes in Our business and legal requirements. We shall place updates on our website.
2. It is Your responsibility to keep yourself updated with the changes.