

The Company is concerned and committed to protecting and maintaining the privacy of all its Users and has published this privacy policy statement (the “**Privacy Policy**” or “**PP**”) to familiarize You with the manner in which the Company collects, stores, uses, discloses, alters, and/or deletes Your personally identifiable information (“**PII**”) collected during your usage of the Locofast Services. Any capitalised terms used but not defined in this PP shall have the meaning ascribed to such term in the Terms and Conditions given above.

### **i. Purpose**

1. The purpose of this PP is to ensure that:
  - a. You are aware of and have complete control over what Customer Data you provide to the Company, and how the same is and will be used by the Company;
  - b. You are at all times aware of the rights available to you with respect to your Customer Data;
  - c. The information provided by you is processed, stored, and used in accordance with the applicable laws, including with respect to maintaining appropriate data protection and privacy infrastructure.
2. We insist upon the highest standards for securing Customer Data and maintaining customer information privacy.

### **ii. Information We Collect**

1. We have already specified (under points 4 and 5 of the ToS) the kind of Customer Data (PII and otherwise) that we require, collect, access, and store during the period of account creation and thereafter during your usage of the Locofast Services. Both You and your End-Users (through you) have the right, at any time, to choose not to provide us with any of this information and to ask us to delete the same, if required. However, doing so may result in the subsequent suspension/hampering of all or a part of the Locofast Services.
2. Cookies: Cookies are pieces of information that are stored on Your computer when the You accesses the Platform. The Platform may use temporary cookies to help you access some of the special functions within the database driven areas of the Platform. Once you leave our Platform, these cookies expire. Cookies do not collect personal identifying information about the user.

### **iii. Information Storage and Security**

1. All the information that we collect from You during your usage of Locofast is stored on third-party servers, located in United States of America and India. We access the information on the cloud. Our third-party service provider uses globally accepted standards for ensuring and maintaining the protection, security, confidentiality, and privacy of all data on its servers.

2. We work hard to protect You from unauthorized access or unauthorized alteration, disclosure or destruction of any Customer Data we hold. Pursuant to the same, we have implemented globally accepted standards and procedures to maintain ongoing data protection and privacy by ensuring the following:

- a. The encryption of all data (both Customer Data and LocoFast Content) using secure server software, which is among the best software available today for secure transactions.
- b. The pseudonymization of all data collected by us, by ensuring that all PII is kept/stored separately from all the remaining information, to ensure that the remaining data cannot be attributed to an identified or identifiable natural person, unless actively merged or joined with the PII;
- c. The constant review of our information collection, storage and processing practices, including this ToS, PP, and the physical security measures to guard against unauthorized access to systems;
- d. The constant upgradation and/or alteration of our policies as may be necessary to ensure the ongoing confidentiality, protection, privacy, security, and accessibility of all data and systems;
- e. Limiting the disclosure of PII to Our employees, independent contractors including vendors, affiliates, consultants, business associates, service providers and distributors of Our services, only on a “need-to-know” basis, and only if the disclosure will enable that person/entity to provide Us with business, professional, or technical support or fulfill Your request and requirements under the services.

#### **iv. Information We Share**

1. In addition to any third-party service providers who, subject to your prior consent, we may share some or all parts of the Customer Data with (as is captured under point 6 of the ToS), we may disclose any information provided by You on the Platform as may be deemed to be necessary or appropriate: (a) under 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 of Use; or (e) to allow Us to pursue available remedies or limit the damages that We may sustain.
2. By agreeing to this PP, you also explicitly understand and consent to the fact that we may share Customer Data with other corporate entities and affiliates only for the purposes of:
  - a. Using their assistance to detect and prevent identity theft, fraud and other potentially illegal acts; or
  - b. Correlating related or multiple accounts to prevent abuse of the LocoFast services

#### **v. Rights Available to You**

1. Once you start using the LocoFast Services, both you and your End-Users (together the “Data Subjects”) shall have the below mentioned rights. If any of your End-Users wish to exercise the below rights, it will be your responsibility to receive the relevant written request from them, and then communicate/transfer

the same to us so that we may take the appropriate action:

- a. Delete/erase all PII (or all data) pertaining to a Data Subject that we may have on our systems. This provision will not apply to any data or PII that we may need to retain pursuant to any applicable law or any request/requirement of a public/government body, whether in your country of residence or not;
  - b. Rectify, modify, or alter any of the PII or other data pertaining to a Data Subject, if you have identified any mistake, error or inaccuracy in the same.
  - c. Restrict or limit the manner and ways in which a particular Data Subjects information/data is processed or used by us;
  - d. Export and provide a Data Subject with a copy of all his/her data, including the PII, that we may have on our servers. This includes all data and server logs pertaining to activities and behaviour on the Platform as well.
2. We will make all commercially reasonable best efforts to comply with all of the above requests (when received) as soon as possible. If as a Customer, you wish to exercise any of your above rights, or if you wish to convey a request on behalf of an End-User, kindly send an email to [mail@locofast.com](mailto:mail@locofast.com).

#### **vi. Change in Privacy Policy**

You acknowledge that becoming a user of the LocoFast Services signifies your assent to this PP. In the event there are any changes to this PP or in the way we treat any Customer Data, we shall intimate you of the same via email at least 1 week prior to the enforcement of such change. We will also display a notice on the Platform regarding the above. If after your receipt of a notice of change to the ToS or PP you do not object to the same and/or continue to use the LocoFast Services, you will be assumed to have provided your consent to the changes.

#### **vii. Choice/Opt-Out**

As stated previously, we provide all Customers with the option and choice of opting-out of receiving certain third-party services and/or the LocoFast Services in general, at any time.

#### **viii. Questions**

Questions regarding this Privacy Policy should be directed to the following email ID: [mail@Locofast.com](mailto:mail@Locofast.com)

#### **ix. Disclaimer**

1. We shall not be liable for any loss or damage sustained by reason of any disclosure (inadvertent or otherwise) of any Customer Data, if the same is either (a) required under point 4.1 above; or (b) was effected through no fault, act, or omission of the Company.
2. We reserve our right to offer our services to any other client/prospective client without restriction.

3. By registering or by using the Platform, you explicitly accept, without limitation or qualification, the collection, use and transfer of the Customer Data in the manner described herein.
4. Please read this Privacy Policy carefully as it affects your rights and liabilities under law.

Any grievances related to any kind of personal information or data, sensitive personal information or data or this privacy policy may be addressed to our Grievance Officer at the following coordinates:

Name: Mohit Piplani

Email: [mohit@locofast.com](mailto:mohit@locofast.com)