



## Privacy Policy

We respect Your privacy; Your privacy is important to Us.

This website <https://freespyrt.com/> ("Website") is owned and run by FREESPYRT Private Limited and its brand 'freespyrt'.

### DEFINITIONS

**"Personal Information"** refers to any information that relates to a natural person, which, either directly or indirectly, in combination with other information available, identifies or can be used to identify, contact or locate a person, to whom such information pertains including, but not limited to the name, address, phone number, fax number, email address, identification number, password, credit/debit card information, the contents of the message and/or attachments You may send to Us, billing information, etc. of such person.

### ABOUT THIS PRIVACY POLICY

Maintaining Your privacy is important to Us. To better protect/maintain Your privacy, the Company provides a privacy policy explaining the online information practices and the choices You can make about the way Your Personal Information is collected, handled, dealt with and used at or in connection with this Website and the Products provided hereon ("**Privacy Policy**"). You have the right to access and update this information. The Company values the importance You attach to Your Personal Information given to the Company and therefore the Company has taken all reasonable measures and precautions to (i) keep such information safe and secure and to prevent any unauthorized access to or misuse of the same; and (ii) enable You to review and edit the same.

This Privacy Policy is effective as of April 1, 2023. This Privacy Policy, together with the terms and conditions of use, describes the Company's policies and procedures on the collection, use and disclosure of the information provided by Users of the Website. The Company shall not use the User's Personal Information in any manner except as provided under this Privacy Policy. Every User who accesses or uses the Website shall be bound by this Privacy Policy.

If You have additional questions or require more information about our Privacy Policy, do not hesitate to contact Us at [contact@freespyrt.com](mailto:contact@freespyrt.com). This Privacy Policy is not applicable to any information collected offline or via channels other than this Website. This Privacy Policy does not apply to the practices of companies that We do not own or control, or to individuals that We do not employ or manage, and We recommend that You review their privacy policies and practices before sharing Your Personal Information with them.

### CONSENT

By using our Website, You are hereby deemed to have consented to our Privacy Policy and agree to its terms of use. The Website collects Your Personal Information when You choose to provide it to Us including but not limited to when You:

- register to use the Website;
- use the Website;
- place an order;
- fill online forms; and/or
- communicate with Us.

The decision to provide Us with Your Personal Information is entirely up to You, but please note that if You choose not to provide Your Personal Information, You may not be able to take full advantage of all the features that our Website has to offer. If You still wish to withdraw Your consent with regard to the collection, use and/or disclosure of Your Personal Information as identified in the Privacy Policy, You may do the same by communicating to the Company, in writing, at the registered email address, [contact@freespyrt.com](mailto:contact@freespyrt.com).

### **PURPOSE OF COLLECTION AND USAGE OF PERSONAL INFORMATION**

At freespyrt, We take the security of Your Personal Information very seriously. We understand the importance of protecting Your Personal Information and ensuring that it is not compromised in any way. We do not trade, sell, disclose or transfer Your or any third party Personal Information in any manner, except as specified herein to which You expressly consent. You acknowledge, consent and agree that the Company may access, preserve and disclose Your Personal Information if required by law or in good faith, if the Company believes that such access, preservation, or disclosure is reasonably necessary: (i) to comply with legal process; (ii) to enforce this Privacy Policy; (iii) to respond to claims that any content violates the rights of third parties; (iv) to respond to Your requests for customer service; or (v) to protect the rights, property, or personal safety of the Company, its other Users and the public.

You may register Your account on the Website for purchasing the Products provided thereon. As a part of the registration process and at any time thereafter for use of the Website, the Company may collect certain personally identifiable information about You and third parties. We collect only such Personal Information that is believed to be relevant and is required to understand Your interests.

We use the Personal Information collected, only to:

- Provide, operate, and maintain our Website and provide You with a customized Website experience;
- Improve and/or, personalize the content on the Website, and expand our Website;
- Understand and analyze how You use our Website;
- Communicate with You, either directly or through one of our partners, including for customer service, to provide You with updates and other information relating to the Website, and for marketing and promotional purposes;
- Otherwise support Your relationship with the Company;
- Send important information regarding the Website, changes to the terms of the Website and policies and/or other administrative information via email(s), applications & web push notifications, SMS and WhatsApp messages;
- Send booking confirmations either via SMS or WhatsApp or any other messaging service;
- Conduct internal reviews and data analysis for the Website (e.g., to determine the number of visitors to the Website);
- Protect the integrity of the Website and the Company;
- Send verification message(s) or email(s);
- Validate/authenticate Your account and to prevent any misuse or abuse;

- Contact You on Your birthday/anniversary to offer a special gift or offers; or
- For such other purposes as the Company may deem fit to prevent fraud and unlawful use of the Website.

### **DISCLOSURE OF PERSONAL INFORMATION**

We will not disclose Your Personal Information to any third party without Your prior permission, unless such disclosure is necessary for compliance with a legal obligation or where such disclosure has been agreed upon between You and the Company.

Notwithstanding anything in this Privacy Policy, the Personal Information shall be shared with the government agencies as mandated under the law to obtain information for the purpose of verification of identity or prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences and/or to any third party mandated by an order under the law for the time being in force. The information so obtained by the government agency and/or the third party as mandated by law, shall not be published or shared with any other person.

### **TRANSFER OF PERSONAL INFORMATION**

In the interests of improving personalization and service efficiency, We may, under controlled and secure circumstances, share Your Personal Information with our affiliate or associate entities that shall ensure the same level of data protection that is adhered to by the Company under this Privacy Policy. This will enable the Company to provide You with information about various Products, which might interest You; or help Us address Your questions and requests. If the assets of the Company are acquired, the Company's customer information may also be transferred to the acquirer depending upon the nature of such acquisition. In addition, as part of business expansion/development /restructuring or for any other reason whatsoever, if the Company decides to sell/transfer/assign its business, or any part thereof, to any of its subsidiaries or any business units, then as part of such restructuring exercise customer information including the Personal Information collected herein shall be transferred accordingly. The transferee of such information shall ensure the same level of data protection that is adhered to by the Company under this Privacy Policy.

### **ACCESSING, REVIEWING, AND MANAGING YOUR PERSONAL INFORMATION**

Following registration, You can access, add to, update and delete certain Personal Information You have submitted during registration. It is important to note that the information You can view, update, and delete may change as the Website changes. When You update/change any such information, We may maintain a copy of the unrevised information in our records. We will retain Your Personal Information for as long as Your account is active. We will retain and use Your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Further, such prior information is never completely removed from our databases due to technical and legal constraints, including stored 'back up' systems. Therefore, You should not expect that all of Your Personal Information would be completely removed from our databases in response to Your requests.

### **THIRD PARTY PRIVACY POLICIES**

We may use third party payment processors (websites controlled by companies other than freespyrt) such as payment gateways, credit card processing companies, etc to assist Us in processing Your payment information securely. We do not allow any unauthorized persons or organization to use any Personal Information that the Website may collect from You. However, the Company is not responsible for any information including Personal Information collected or shared or used by any other third party Website due to Your browser settings. Further, under certain circumstances, third parties may unlawfully intercept or access transmissions or private communications or may abuse or misuse Your information that they collect from the Website. Although the Company uses industry standard security practices to protect Your

privacy, the Company does not promise, and You should not expect, that Your Personal Information or private communications would always remain private.

We may also use third party advertising companies (websites controlled by companies other than freespyrt) to display advertisements on the Website. These companies may use information about Your usage to this Website, in order to provide advertisements on the Website about goods and services that may be of interest to You. Third-party advertisement servers or advertisement networks use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on the Website, which are sent directly to the Users' browser. They automatically receive Your internet protocol (IP) address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that You see on websites that You visit.

The third-party websites mentioned above are regulated by their respective privacy policy and are not under the control of the Company. Customers willing to access the said third party websites shall do it at their own discretion and are requested to go through their respective privacy policy. You can choose to disable cookies through Your individual browser options. Note that freespyrt has no access to or control over these cookies that are used by third-party websites and shall not be held responsible for any default arising out of the linked/third party website.

## **MINORS**

Another part of our priority is adding protection for minors while using the internet. This Website is not intended for use by minors, and thus We do not knowingly collect any Personal Information from minors under the age of 18. If You are under the age of 18, please do not submit any Personal Information through our Website. We strongly encourage parents and legal guardians to monitor and guide the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. If You have reason to believe that a minor has provided Personal Information to Us through our Website, We strongly encourage You to please contact Us immediately and We will do our best efforts to promptly remove such information from our records. If freespyrt becomes aware that a minor has registered or used the Website without approval, We have the right to expunge any related Personal Information of such minor from our records and cancel the account, if any.

## **NEWSLETTERS**

We offer electronic newsletters that You may choose to subscribe to at any time. If You decide to sign up for our newsletter or marketing emails, You can always unsubscribe by following the instructions included in these emails or by contacting Us directly. It is important to note that even if You choose to unsubscribe from our marketing emails, You will still receive essential transactional emails related to any purchase requests that You make.

## **FORCE MAJEURE EVENT**

Notwithstanding anything contained in this Privacy Policy or elsewhere, the Company shall not be held responsible for any loss, damage or misuse of Your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event (as defined below).

A "**Force Majeure Event**" shall mean any event that is beyond the reasonable control of the Company and shall include but is not limited to sabotage, fire, flood, explosion, acts of God, pandemic, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption.

## **USE OF COOKIES AND WEB BEACON**

The Website uses "cookies" to help personalize Your online experience. When You use the Website, certain information may be stored locally on Your device using "cookies" or similar technologies. A cookie is a text file that is placed on Your hard disk by a web page server if the web browser of Your device is enabled to accept cookies. Cookies are used to remember Your preferences and settings, to personalize Your experience on the Website, and to track Your behavior and activities on the Website. Cookies can also be used to gather information about Your browsing history and to serve targeted advertisements. Some cookies are essential for the proper functioning of the Website, while others are optional and can be turned off or deleted. It is important to note that cookies cannot be used to access any other data on Your device nor can they be used to deliver viruses or malware to Your device. Cookies are uniquely assigned to You, and can only be read by a web server in the domain that issued the cookie to You.. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but You can usually modify Your browser setting to decline cookies if You prefer.

### **LOG FILES**

The Company follows a standard procedure of using log files which logs visitors when they visit the Website. When You visit the Website, We may automatically collect and record certain information that Your browser sends including but not limited to internet protocol (IP) addresses, browser type and language, internet service provider (ISP), date and time stamp, referring/exit pages, possibly the number of clicks, language preferences or the webpage You were visiting before You came to the Website, pages of our Website that You visit, the time spent on those pages, information You search for on the Website, access times and dates, and other statistics. The purpose of the information is for better understanding of Users' operating systems, analyzing trends, administering the site, tracking Users' movement on the Website, and gathering demographic information. We do not use this data to identify the name, address or other personal details of any User.

### **INFORMATION SECURITY**

We take the security and privacy of Your Personal Information very seriously and strive to protect it with reasonable administrative, technical, and physical safeguards. We store the information You provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure.. However, please note that no data transmission over the Internet or wireless network can be guaranteed. Therefore, while We strive to protect Your Personal Information, You acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between You and our Website cannot be guaranteed; and (iii) any such information and data transmitted over the Internet may be viewed or tampered with by a third party, despite best efforts. By using our Website, You acknowledge and accept these inherent security and privacy limitations of the Internet.

### **DATA BREACH**

In the event that We become aware of any security breaches or external activity, including, but not limited to, security attacks or fraud that compromises the security of the Website or disclosure of Users' Personal Information to unrelated third parties, We reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, We will make reasonable efforts to notify the affected individuals if We believe that there is a reasonable risk of harm to the User as a result of the breach or if notice is otherwise required by law. We will do this by sending an email to the affected individuals with information about the breach, the potential risks, and the steps We will be taking to address the situation. We will also take all reasonable measures to prevent similar incidents from occurring in the future.

## **CHANGES AND AMENDMENTS**

We reserve the right to modify this Privacy Policy at any time, without prior notice to the User. Such changes shall be effective as soon as they are posted on the Website . When We do, We will revise the updated date at the bottom of this page. Continued use of the Website after any such change shall constitute Your consent to the updated Privacy Policy. We encourage You to review this Privacy Policy periodically to stay informed about how We are protecting Your Personal Information. The Company assures that such changes would not lessen the protection promised to the Users for securing their privacy.

## **RETENTION OF INFORMATION**

The Company shall retain Your Personal Information on its servers for as long as is reasonably necessary for the purposes listed in this Privacy Policy. In some circumstances, the Company may retain Your Personal Information for longer periods of time, for instance where the Company is required to do so in accordance with any legal, regulatory, tax or accounting requirements.

## **LOCAL REGULATIONS**

If You choose to access the Website from any location outside India, You do so on Your own initiative and at Your own risk and the Company makes no representation that the materials or the content on the Website are appropriate or available at any such location, territories and protectorates. In such a case, You are responsible for complying with local laws, if and to the extent local laws are applicable. You shall comply with all applicable laws including all data protection laws concerning the transmission of technical data exported from India or the country You reside in.

## **HOW TO CONTACT US**

This Website is published, controlled, owned and operated by the Company. All communication to the Company should be directed over email, sent to [contact@freespyrt.com](mailto:contact@freespyrt.com).

The company shall redress the complaint expeditiously and in compliance with applicable laws.

## **GOVERNING LAW AND JURISDICTION**

This Privacy Policy shall be governed by, construed and enforced in accordance with the laws of India. You hereby consent and submit to the exclusive jurisdiction of the competent courts of Mumbai, Maharashtra for any action or matter however so arising out of this Privacy Policy.

**Thank You for using the website.**