



## **PRIVACY POLICY**

### **Last Updated November 1, 2023**

This Privacy Policy tells you about Blu Ultraband Internet Services, Blu Ultraband Internet Services Private Limited, BluWiFi Internet Services Private Limited (hereinafter collectively referred as “BLUIS” or “BluWiFi”) and its subsidiaries' policies and practices for the collection, use, processing, storage, transfer, and disclosure of Personal Information that we may collect or observe. BluWiFi collects or observes information through a variety of difference contexts (collectively referred to as the “BluWiFi Platform”), and how we use, process, store, transfer, and disclosure Personal Information varies based on the context through which it was collected.

## **Personal information**

### **Categories of types of Contexts**

BluWiFi collects personal information in a variety of contexts, each of which is defined below. The categories of information, types of information, sources of information and our purposes for collecting, processing, using, and sharing such information is determined based on this context.

- **Websites** BluWiFi collects Personal Information through our Mobile application, websites, including, but not limited to, the website or subdomains of [www.bluwifi.in](http://www.bluwifi.in), or any website that posts this policy (collectively, the “Sites”). Personal Information collected through our Mobile Application or website, but in a different context defined in this Policy is treated in compliance with the stated context and not the Websites Context.
- **Products and Services** BluWiFi collects Personal Information through your use of products and services made available to you by us. This includes hardware, software (including software for mobile devices or “apps”), cloud data services, professional services, and support services.
- **Social Media** BluWiFi collects Personal Information through your use of our social media pages and apps, through HTML-formatted email messages that link to this Privacy Policy, through your interactions with third party social media (such as LinkedIn, Facebook, or Twitter), and when you publicly post using BluWiFi-related hashtags.

- **Interactions with Job Applicants** BluWiFi collects Personal Information when you apply for a job with us, interact with our third-party partners with regard to postings of job openings at BluWiFi, or provide information to our internal or external recruiters via email or web forms.
- **Market Research** BluWiFi collects Personal Information from third party service providers for the purpose of market research, product research, targeted advertising, and business development.
- **Offline** When you interact in person with representatives from BluWiFi, such as at an event we host or participate in or when you place an order over the phone or contact customer service by phone, you may disclose or we may observe or infer Personal Information about you that you did not directly state.

## Categories of types of personal information and types of information defined

“Personal Information” is information relating to, directly or indirectly, an identified or identifiable natural person or household. This includes things like your name, postal address, telephone number, and email address, as well as less obvious information, which are included in the following defined categories. We may collect, and may have collected within the preceding 12 months, the following categories of Personal Information:

- **Individual Identifiers** This includes information like your name, email address, physical address, telephone number, login alias, IP address or Other Information that identifies you regardless of your continuing relationship to BluWiFi.
- **Inferences** This includes customer profiles, usage preferences, or other information about an individual’s anticipated or assumed actions or behaviours.
- **Customer Records** This includes information like your name, company name, UPI id, service account number, customer identifier, or Other Information that relates to you as a customer of BluWiFi.
- **Education information** Includes information about your educational history, such as the schools you have attended, the courses of study you followed, the status of any required continuing education for professional licensing, or Other Information relating to your education.
- **Commercial Information** This includes payment card data, financial account information, account information, records of products or services purchased, obtained or considered, or other purchasing or consuming histories or

tendencies of the customer, and Other Information necessary to collect and process payment for products and services ordered by the customer.

- **Electronic Network Information** This includes information like browser and device data, and internet or network activity information, such as activity on our Websites and Services, data collected through cookies and other technologies, and other Information that is generated through your use of the internet to access our websites.
- **Geolocation Data** This includes information such as your precise location or city, state, county, or country, if you have such geolocation data enabled when using the applicable social media application. For example, if you use a social media account to “Check In” at a BluWiFi-run event, we can collect that information.
- **Audio, electronic, visual, or similar information** includes information that is captured on audio or video recording, such as if a telephone or video call is recorded, or simply observable in such interaction or in an Offline Context.
- **Professional and Employment Related Information** This includes your contact details, user name and password to be able to access the Careers Site where you can apply for jobs, and information about your current or past employers, memberships in professional associations or trade unions, and professional licensing status if you make such information publicly available in the context from which the Personal Information is collected, such as in your publicly available social media accounts, through a resume submitted to us, or by attending a professional event associated with an affinity group. This may also include your work authorization status, skills, information relating to references and any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships).
- **Sensitive Information Protected under Law** This includes characteristics of protected classifications under law, such as information about your age, race, religion, gender, gender identity, sexual preference, disability, political preference, trade union membership, philosophical views, marital status, medical or health information, genetic or biometric information, biometric templates, veteran status, background check information, judicial data or information on other judicial or administrative proceedings, or other pieces of information of particularly sensitive nature, if you make such information publicly available in the context from which the Personal Information is collected, such



as in your publicly available social media accounts, through a resume submitted to us, or by attending a professional event associated with an affinity group

## Other Information

Other Information means any information that does not reveal your specific identity or does not directly relate to an identifiable individual, such as: browser and device data, App usage data, data collected through cookies and other technologies, demographic information and other data provided by you that does not reveal your specific identity, or other types of information that has been aggregated in a manner such that it no longer reveals your specific identity.

## Categories of sources of information defined

- **Original Sources** Information provided by an individual about that individual.
- **Customer Sources** Information provided about an individual by a customer, such as when one employee of a customer provides information about a colleague in the course of setting up services.
- **Third Party Sources** Information collected from third-party sources, such as publicly available databases, social media platforms, third party providers of market research data, and our affiliates, business and joint marketing partners who share information with us.
- **Product Sources** Information sent to BluWiFi by our products because you use our products.
- **Services Sources** Information sent to BluWiFi by our services because you use our services.

## Sale of personal information

BluWiFi does not sell Personal Information collected in any Context under this Privacy Policy

## Collection, use, and disclosure of personal information

The following disclosures reflect our treatment of personal information collected in the defined contexts in which we do business

## Websites

- **Categories and Types of Personal Information** We collect Personal Information about you when you use the Sites, including Individual Identifiers, Customer Records, Inferences, and Electronic Network Information.
- **Categories of Sources of Information** Personal Information collected in the Website context is collected from Original Sources, Customer Sources, and Third-Party Sources.

## Products and services

BluWiFi products and services send a variety of information to BluWiFi in accordance with the product documentation and contracts for sales. This information is classified as follows, and as further defined in the sales contracts:

- **Customer Content** Any information provided by Customer that BluWiFi may operate on, where such operation is on the Customer's behalf as part of providing Products or Services.
- **Functional Data** Data, which does not contain Customer Content, which is generated by BluWiFi providing the Product or Service, and which informs BluWiFi in the development, deployment, operations, maintenance, and securing of the Product or Service.
- **Support Information** Information, which is not Customer Content, provided to BluWiFi by or for a Customer for the purpose of providing technical support pertaining to the Product or Service and/or maintaining a Customer's Product or Service.

Personal Information may be included in any of these data classifications. However, BluWiFi only collects Functional Data and Support Information because Functional Data and Support Information are necessary for us to provide the products and services to you. We will process Customer Content in accordance with the applicable service terms, but this data is not specifically collected by BluWiFi.

**Categories and Types of Personal Information We Collect** We collect Personal Information about you when you use the Products or Services, including Individual Identifiers, Customer Records, Electronic Network Information, Inferences, and Commercial Information.



**Categories of Sources of Personal Information** Personal Information collected in the Products and Services context is collected from Original Sources, Customer Sources, Product Sources, Services Sources, and Third-Party Sources.

**Purpose for Collecting and Basis for Processing Personal Information** BluWiFi collects and processes Personal Information collected through the Products and Services solely for the purpose of providing the services and commercial purposes ancillary to providing the products or services, and BluWiFi will not retain, use, or disclose Personal Information collected through the Products or Services except as stated in this Privacy Policy.

**Categories of Third Parties with Whom We Share Personal Information** BluWiFi uses third-party service providers and/or agents to provide services on our behalf and may share Personal Information collected by the Products and Services with them to assist them in providing these services. These can include providers of services such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services. We also may share Personal Information with channel partners or resellers if you inquire about our products or services typically fulfilled through channel partners or resellers. These channel partners or resellers may also use this information to inform you about third-party products or services that may be of interest.

BluWiFi may use third-party service providers and agents in the provision of the Products and Services.

**Third Party Advertisement** Personal Information collected through the Products and Services is not used for advertisement purposes.

## Social media

**Categories and Types of Personal Information** We may collect Personal Information about you in Social Media context including Individual Identifiers, Customer Records, Inferences, Electronic Network Information, Geolocation Data, Professional and Employment Information, and Sensitive Information Protected under the Law.

**Categories of Sources of Information** Personal Information collected in the Social Media context is collected from Original Sources, Third-Party Sources, and Customer Sources.

**Third Party Advertisement** In addition to the third-party advertising companies we use to serve advertisements regarding goods and services that may be of interest to

you when you access and use social media, a third-party social media provider may provide further advertising. Please review third party social media privacy policies for their advertisement and privacy policies.

## Market research

**Categories and Types of Personal Information** We may collect or otherwise observe Personal Information from individuals in the market research context, including Individual Identifiers, Inferences, Employment Records, Education information, Geolocation Data, Audio, electronic, visual, or similar information, Professional and Employment Related Information, and Sensitive Information Protected under Law

**Categories of Sources of Information** Personal Information collected in the Market Research context is collected from Original Sources, Third-Party Sources, and Customer Sources.

## Offline

**Categories and Types of Personal Information** We may collect or otherwise observe Personal Information from individual's offline, including Individual Identifiers, Inferences, Employment Records, Education information, Geolocation Data, Audio, electronic, visual, or similar information, Professional and Employment Related Information, and Sensitive Information Protected under Law.

**Categories of Sources of Information** Personal Information collected in the Offline context is collected from Original Sources, Third-Party Sources, and Customer Sources.

**Third Party Advertisement** We do not use third-party advertising companies to serve advertisements based on Personal Information we collected Offline.

## Purpose for collecting and basis for processing personal information

Unless otherwise limited by the context in which it was collected, Personal Information collected by BluWiFi is used for our legitimate business purposes, including:

### Accomplishing our business purposes

- For improving the content of the BluWiFi Platform, for example, by incorporating information that is relevant to our clients;





- For preventing fraud or other illegal activities, such as wilful attacks on BluWiFi information technology systems or the BluWiFi Platform;
- For data analysis, for example, to improve the efficiency of the BluWiFi Platform
- For audits, to verify that our internal processes function as intended and address compliance with legal, regulatory or contractual requirements;
- For developing new products and services;
- For enhancing, improving, or modifying our current products and services;
- For identifying usage trends, for example, understanding which parts of the BluWiFi Platform are of most interest to users;
- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users;
- For operating and expanding our business activities, for example, understanding which parts of the BluWiFi Platform are of most interest to our users so we can focus our energies on meeting our users' interests.
- For identifying candidates for employment.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

#### **Providing the functionality of the BluWiFi Platform and fulfilling your requests**

- To send administrative information to you, such as changes to our terms, conditions and policies and to notify customers about updates to the BluWiFi Platform;
- To respond to your inquiries and fulfil your requests, when you contact us via one of our online contact forms or otherwise;
- To process your orders, and provide you with related customer service;

We will engage in these activities to manage our contractual relationship with you and to comply with a legal obligation.

#### **Providing you with our newsletter and/or other marketing materials and facilitating social sharing**





- To contact you for marketing and sales purposes, including notifications related to product enhancements, warranties, and renewals, that are related specifically to customer needs and interests;
- To contact you about a BluWiFi offer in support of your business needs or to conduct online surveys to better understand our customers' needs;

We will engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, or with your consent.

### **Analysis of Personal Information for business reporting and providing personalized services**

- To analyse or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our Websites and Services;
- To better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests, such as by displaying targeted advertising that might be tailored to your interests;
- To better understand your preferences so that we can deliver content via our Websites and Services that we believe will be relevant and interesting to you.

We will provide personalized services either with your consent or because we have a legitimate interest.

### **Allowing you to participate in surveys, contests, or other promotions**

- To offer you the opportunity to participate in surveys, contests or other promotions. Some of these promotions have additional rules containing information about how we will use and disclose your Personal Information.

We use this information to manage our contractual relationship with you.

### **Aggregating and/or anonymizing Personal Information**

- We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.

## Categories of third parties with whom we share personal information

Unless otherwise limited by the context in which it was collected, Personal Information collected by BluWiFi can be disclosed to our subsidiaries for the purposes described in this Privacy Policy. BluWiFi is the party responsible for the management of the jointly-used Personal Information.

BluWiFi may use third-party service providers and agents to provide services on our behalf and may share Personal Information with them to assist them in providing these services. These can include providers of services such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services. We also may share Personal Information with channel partners or resellers if you inquire about our products or services typically fulfilled through channel partners or resellers. These channel partners or resellers may also use this information to inform you about third-party products or services that may be of interest.

If you use communities, blogs, or chat rooms on BluWiFi Services, you should be aware that any Personal Information you submit there can be read, collected, and used by other users of these forums, and could be used to send you unsolicited messages. You may also elect to disclose Personal Information through your social sharing activity.

The following chart details the categories of Personal Information we have disclosed for our operational business purposes in the preceding 12 months.

## How you can access, change or delete your personal information

Personal Information may be accessed, changed/corrected, or deleted directly by through the context it was collected. In the event, however, you cannot access, change/correct, or delete Personal Information through the context in which it was collected, or if you would like to restrict the use of your Personal Information, object to the processing of your Personal information or request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you



may contact us by email write to us at the address at the end of this document. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to respond to your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase, you may not be able to change or delete the Personal Information provided until after the completion of such purchase) or as required by the applicable laws, regulations or statutory compliances

We may exempt certain Personal Information from requests pursuant to applicable data protection laws or other laws and regulations.

## Third party advertisement

Unless otherwise limited by the context in which it was collected, we may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you, including when you access and use social media.

You may receive advertisements based on information relating to your access to and use of the Websites and other websites or online services, including social media platforms, on any of your devices, as well as on information received from third parties. These companies may place or recognize a unique cookie on your browser. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. This is in addition to any advertisement that a third-party social media provider may provide. Please review third party social media privacy policies for their advertisement and privacy policies.

## Other uses and disclosures

We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law.
- To respond to requests from public and government authorities
- To cooperate with law enforcement.
- To enforce our terms and conditions; and
- To protect our rights, privacy, safety or property, and/or that of our subsidiaries, you or others such as
- In connection with a sale or business transaction where we have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) Such third parties may include, for example, an acquiring entity and its advisors.

## Collection of other information

If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy.

## Communications or utilization information

Through your use of telecommunications services to access the BluWiFi Platform, your communications data (e.g. Internet protocol ("IP") address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated. Your IP address may be identified and logged automatically in our server log files whenever a user accesses the BluWiFi Platform, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP



addresses for purposes such as calculating usage levels, diagnosing server problems and administering the BluWiFi Platform. We may also derive your approximate location and your company from your IP address.

## Information collected automatically through your browser or device

When you access the BluWiFi Platform, we may automatically collect information such as: type of Internet browser and operating system used, domain name of the Web site from which you came, number of visits, average time spent on the site, pages viewed. We use this information to ensure the BluWiFi Platform function properly, monitor the relevancy of the BluWiFi Platform and improve their performance or content.

## Information stored automatically on your computer

A cookie is a piece of Electronic Network Information that is stored on your computer's hard drive by your Web browser. When you revisit our platform, our server recognizes the cookie, giving us information about your prior visits. Most browsers accept cookies automatically, but you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you can still use most of the features of the BluWiFi Platform, including ordering items. We do not currently respond to browser do-not-track signals.

We may work with companies that use third-party cookies and other means to collect anonymous information that helps us measure and improve our content and advertising effectiveness. Such companies may also collect information regarding the use of other websites, apps and online resources.

## Uses and disclosures of other information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

## Retention period

We will retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the BluWiFi Platform to you;
- Whether there is a legal obligation to which we are subject; or
- Whether retention is advisable in light of our legal position

## Minors

No services on the BluWiFi Platform are directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under eighteen (18).

## Security

BluWiFi uses reasonable and appropriate technical and organizational security measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us.

## Third party web sites and the BluWiFi platform

The BluWiFi Platform may contain links to other Web sites or services. BluWiFi is not responsible for the privacy, information or other practices of third parties, including any third party operating any website or service to which the BluWiFi Platform links, or for the content of other Web sites. The inclusion of a link on the BluWiFi Platform does not imply endorsement of the linked site or service by us or by our subsidiaries.

## Cross-border transfers

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the BluWiFi



Platform you understand that your information will be transferred to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information

## Sensitive information

Except as noted in specific contexts, we do not collect and ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the BluWiFi Platform or otherwise to us.

## Updates to this privacy policy

Internet, technology and our systems keep improving with time and so will our Privacy Policy and we will post such changes to this policy published at our platform. Your use of the BluWiFi Platform following these changes means that you accept the revised Privacy Policy. Please check this page regularly to keep up-to-date

## Questions and comments

BluWiFi is the company responsible for collection, use and disclosure of your Personal Information under this Privacy Policy.

If you have any questions or comments about this Privacy Policy, or would like to request information please send us your questions and feedback.

You can contact us at [services@bluwifi.in](mailto:services@bluwifi.in) or at the following address:

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