

This privacy policy describes RUJON SERVICES'S Practices for collecting, using, disclosing, maintaining and protecting your personal information on the media platforms we operate including the RUJON SERVICES app on the iOS or android platforms (the 'App'), WWW.rujonservices website or any other platform on which you see this privacy policy (collectively, the "services"). we will herein call our users as "You "in this privacy policy. This privacy policy is incorporated into, and part of the Terms of Use (the "terms of Use") which governs use of RUJON services to our users. Please read this privacy policy clauses carefully to understand our policies and practices for processing and storing your personal information. By accessing and utilizing our services, you accept and consent to the practices described in this privacy policy. This privacy policy may change from time to time (see changes to our privacy policy). Your continued access and/or use of our services after any such revisions indicates that you accept and consent to them. Please check time to time for updates.

1.The platforms on which our services run may include links to third party services, plug-ins and applications and clicking on those links or enabling those connections may allow third parties to collect or share your personal data. We don't have any control over these third-party services and are not responsible about their privacy policies. When you visit such services, we encourage you to read their privacy statements thoroughly.

2.We collect different types of personal information about you depending on how you interact with our services. Personal information contains any information about an individual from which that person can be identified. It does not include information where the identity has been removed or is no more associated with our services. A big part of information we obtain is given to us by you through filling the sign-up forms, registering for an account on our platform or otherwise providing information when asked to do so. The means and methods of collecting may vary in case of change of services.

We may process the following types of personal information about users which has been categorized as follows:

- A. Identifiers -This may include your name, any username (or similar identifier), date of birth, gender and profile picture in case upload by user.
- B. Contact Information-This may include email address, mailing address, contact number.
- C. Valid id proof-This may include pan card, Aadhar card details of users issued by proper authorities.
- d. Bank account details-this information contains users bank account details i.e., account number, IFSC code for the purpose of transferring winning amount or pay the entry fee of contests.
- e. technical information-This may include your Ip address (which may identify your general geographic location), device identifier data, the type of device you use, your operating system and version, the URL'S of our web pages that you visit, the URL'S of referring and exiting pages, the pages you view, the time spent on a particular page, the platform type and generalized, non-specific location data.
- f. Usage Information-This may include the type of games you play, game features, game preferences, time spent on games.
- g. Account Information-This may include your username and password, user preference, feedback and survey responses.
- h. Marketing and communications information-This may include your web surfing preferences for the purpose of marketing and advertisement notification provided by us and or third parties.

i. Geolocation data-we collect your geolocation data whenever you choose to access the rewards or wallet features and play the contest on our online platforms. we use this data to determine our legal obligations in that jurisdiction.

3.We collect users' information in different ways. The most common practice of collecting information is through your direct interaction with our services and occasionally from third parties or publicly available sources.

Following described methods are some of the common tools through which we collect information of users –

When you interact with our services, you may provide us your personal information by filling in forms, communicating with us by email, telephone, text/ SMS, post or otherwise.

This may include users' personal information when users subscribe for our services/register for an account, request that the app be sent to you, enter a contest, request marketing be sent to you, enter the contest, competition, survey or promotion, provide us feedback, request support or otherwise communication with us.

As you interact with our services, we may automatically collect technical information and usage information. We collect these categories of personal information by using cookies, SDK'S, Web beacons and other similar technologies.

Third parties or public sources -we may share and receive personal information about you from various third parties as follows:

Technical Information and usage information from the following parties: Advertising Networks contact information, Transaction information, and technical information from providers of technical, communications, and service providers; Social Networking posting tools and share features. When you visit a page that includes one of these sharing tools, the third-party company that operates the tool may be collecting information about your browser, device, and other online activity through its own technology not controlled by us. Please read their privacy policies.

Identifiers and technical information from social networks when you grant us permission to access data on one or more of those services.

Publicly visible data, such as your social media and other information submitted to social media or other publicly available media.

4. We will only use your personal information when allowed by law. Generally, we will use your personal information: (a) where we need to perform the contract we are about to enter into or have entered into with you; (b) where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests; and (c) where we need to comply with a legal or regulatory obligation.

We have identified what our legitimate interests are where appropriate. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity

Type of data (varies depending on circumstances)

Lawful basis for processing including basis of legitimate interest

**To register you as a user of our Services.**

Contact Information

Account Information

Performance of a contract with you.

Notifying you about changes to our terms or Privacy Policy.

Necessary to comply with a legal obligation

To enable you to participate in a game, contest, competition, survey, or similar event.

Identifiers

Technical Information

Usage Information

Performance of a contract with you.

Legitimate Interests (to learn how our users use our Services, to improve our Services, to grow our business).

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

Identifiers

Contact Information

Technical Information

Usage Information

Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)

To provide you with information and marketing communications about our products and services.

Identifiers

Contact Information

Marketing and Communications Information

Consent

Legitimate Interests (in marketing goods or services in which you may have a personal interest based on our ongoing business relationship).

To provide you with third party offers that may be relevant to you.

Identifiers

Contact Information

## Marketing and Communications Information

### Consent

To respond to customer service requests including order status and chat communications.

### Identifiers Contact Information

### Technical Information

Legitimate Interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)

### Consent

## 5. Marketing and Advertising Practices

We may reach out to you in different ways, for example, to tell you about new features, games, on the App we think you'd be interested in, or to show you how to use a particular feature we think you may enjoy. However, you can also let us know that you'd rather not hear from us with this type of communication.

**Promotional Offers from RUJON SERVICES App.** We may use any of the categories of personal information we collect to make decisions about what we think you may desire or need as our consumer. We will only make these marketing decisions if you agree to receive email marketing from us. In all cases, we allow you to opt-out of receiving marketing communications from us.

**Interest Based Advertising.** RUJON SERVICES platform uses advertising to help fund our services and we utilize and numerous advertising technology platforms to help deliver relevant advertising to you. RUJON SERVICES and the technology service provider may collect, receive, or use your personal data in connection with our use of the platform in order to provide interest-based advertising to you. In such cases the advertiser is acting as a controller of the data for its own purposes.

You can opt out of interest-based advertising from Google by visiting the About Google Ads page or opt out of the DoubleClick cookie by installing the DoubleClick opt out extension. Please visit google page for their policies regarding this subject matter.

Please refer to the privacy policies of our advertising partners for more information on how to exercise your rights and control your advertising choices. Our advertisers include the following:

**Mobile App Advertising and Tracking,** our authorized service providers and/or other third-party partners involved in the delivery of advertising you receive through our App may collect information about your mobile device, including your mobile device's advertising identifiers and the names and IDs of apps you have installed, as well as information about how you use our mobile applications and other unaffiliated applications. We and our partners use this information to enable interest-based advertising you receive through our Services and within third-party apps and other marketing channels. Depending on your device and operating system, you may be able to reset your mobile device's advertising identifier to limit this data collection or prevent the collection of usage data across unaffiliated applications for interest-based advertising purposes by accessing the privacy settings on your mobile device. Each operating system, iOS for Apple devices, Android for Android devices and Windows for Microsoft devices, provides its own instructions. Visit the privacy settings for your mobile device for more information.

In addition, you may see our services advertised in other services. After clicking on one of these advertisements and installing our app, you will become a user of our Service. In order to verify the installs, a device identifier may be shared with the advertiser.

**Social Media Advertising.** RUJON SERVICES also runs other kinds of online ad campaigns on social networking websites and other third parties' websites and apps. Some of these ads may be based on information we have about users. If RUJON SERVICES provides information to a website or app for these advertising purposes, the information may only be used to display the RUJON SERVICES ad. Please see the privacy policy of the website or app where RUJON SERVICES ad is shown for more information about its privacy practices and privacy choices it may offer.

## 6. Disclosures of Your Personal information

From time to time, we may need to share your personal information with others, including in the following circumstances.

**Disclosures to the Public-** Some of your personal information will be shared with the general public, including your first name and last name initial, city, state, and country. When information is made publicly available it may be accessed by anyone with access to the platform to which the information is posted. It may also be indexed by third-party search engines, and be imported, exported, distributed, aggregated, and redistributed by others without our knowledge.

**Third Party Service Providers-** We may share your personal information with third party service providers who perform various functions to enable us to provide our services and help us operate our business, such as website design, sending email communications, fraud detection and prevention, customer care or performing analytics. Our contracts with these third parties require them to maintain the confidentiality of the personal information we provide to them, only act on our behalf and under our instructions, and not use personal information for purposes other than the product or service they're providing to us or on our behalf.

**With our Affiliates and Partners-**When participating in events or activities that we offer along with our partners and/or affiliates, you may be asked to share personal information with those affiliates and/or partners. For example, a game, contest, competition or other offering may be co-sponsored by another company or companies. In such a situation, the information we obtain from you in connection with such contest, competition or offering may be shared with our co-sponsor, unless you instruct us not to (which may result in you not being able to participate). In some of those cases, we may act as co-controllers of your personal information, depending on the circumstances.

**With Unaffiliated Controllers-**In some cases, we may transfer personal information to unaffiliated third-party data controllers. These third parties do not act as agents or service providers and are not performing functions on our behalf. We may transfer your personal information to third-party data controllers for the following purposes: 1) to provide you with third-party offers; 2) to provide us information about the quality of our services offerings. We will only provide your personal information to third-party data controllers where you have not opted-out of such disclosures, or in the case of sensitive personal information, where you have opted-in if the disclosure requires consent. We enter into written contracts with any unaffiliated third-party data controllers requiring them to provide the same level of protection for your personal information that is required of us. We also limit their use of your personal information so that it is consistent with any consent you have provided and with the notices you have received.

Protection of RUJON SERVICES and Others- We may share personal information when we believe it is appropriate to enforce or apply our Terms of Service and other agreements; or protect the rights, property, or safety of RUJON SERVICES, our products and services, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and risk reduction. This does not include selling, renting, sharing, or otherwise disclosing personal information of our customers for commercial purposes in violation of the commitments set forth in this Privacy Policy.

Response to Subpoenas and Other Legal Requests- We may share your information with courts, law enforcement agencies, or other government bodies when we have a good faith belief we're required or permitted to do so by law, including to meet national security or law enforcement requirements, to protect our company, or to respond to a court order, subpoena, search warrant, or other law enforcement request.

Sale of Our Business- If we sell, merge, or transfer any part of our business, we may be required to share your information. If so, you will be asked if you'd like to stop receiving promotional information following any change of control.

With your Consent- Other than as set out above, we will provide you with notice and the opportunity to choose when your personal information may be shared with other third parties.

## 7. Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

You may request access to, correction of, or deletion of your personal information. You can often go directly into the Service under Account Settings to take these actions. Please note that even if you request for your personal information to be deleted, certain aspects may be retained for us to: meet our legal or regulatory compliance (e.g., maintaining records of transactions you have made with us); exercise, establish or defend legal claims; and to protect against fraudulent or abusive activity on our Service.

**Objection.** -You may object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Restriction.**-You have the right to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Portability.** -You have the right to request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw Consent.** If we have collected and processed your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**File a complaint.** -You have the right to file a complaint with a supervisory authority about our collection and processing of your personal information.

To file a request or take action on one of your rights, please contact us at the contact details provided. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 09. Children's Privacy

We do not intend to collect any personal identification information of children under the age of thirteen (13), but there may be errors during the process of collection of data. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we would take action to ensure that such information is deleted from our server.

## 10. Changes to our Privacy Policy

By using this website, you agree to the terms and conditions contained in this Privacy Policy and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use this website. You agree to abide by any limitation on damages contained in any agreement we may have with you.

This Policy is expected to change from time to time. We reserve the right to amend this Privacy Policy at any time and provide notice to you by posting of the amended Privacy Policy on the website. We may also email you to give you notice of material changes to this Privacy Policy. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of this Services.

## 11. How to Contact Us

If you have any questions or wish to register a complaint in relation to this Privacy Policy or the manner in which your personal information is used by us, please write to us.