

# PRIVACY POLICY

*Disclaimer: The Company can modify this Policy unilaterally at any time without notice.*

*Modification may be necessary, among other reasons, to maintain compliance with applicable laws and regulations or accommodate organizational changes within the*

*Company. Please keep visiting this page regularly to take notice of any changes we make. If you do not agree with any part of this Policy, please stop using our Platform immediately.*

The website – www.grubsoul.in ("Website") and the mobile site - www.grubsoul.in ("Msite") (together referred to as the "Platform") are made available by Emerald Deli Hub Private Limited ("Company" or "Grubsoul" or "we"). Grubsoul has created this privacy policy ("Privacy Policy" or "Policy") to demonstrate our firm commitment to protecting the information you submit while using our Platform. The manner in which this information is collected, retained, shared, stored, and processed by us is addressed in this Policy.

This Policy, incorporates, and include our Terms of Service ("Terms"). Words and phrases not defined in this Policy shall mean the same as provided in the Terms.

By using the Platform (or even just browsing the Platform), you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy.

## *A. What kind of personal information do we collect from you and when is it collected?*

1. Information shared during registration and account creation: In order to avail the Products and Offers, you will be required to register as a user using your phone number. However, for ordering Products you will be required to provide your name, phone number, email ID, address and pin code.
2. Information from visitors and for participation: Visitors to our Platform may choose to submit their name, email address and/or other information to learn more about our Products, Offers, to take part in a Company sponsored event, or to participate in a survey among other things.
3. Financial and KYC Information: Your information including credit/debit card number, UPI ID, billing address, payment instrument details, etc may be collected by Paytm secure online payment system. Credit card information collected on the Platform is stored on Paytm secure sites and are available to us for up to 30 days. Such information is governed by Paytm's privacy policy.
4. Feedback Data and Other Data:  
This includes:
  1. If you call our customer service, we may record information provided by you to service you or record the calls for quality and training purposes.
  2. Data you input when you participate in our loyalty programs or use any discount codes offered by us.
  3. If you provide any feedback or comments to us on the Platform.
5. Information about other people: You may order Products or avail Offers for a person other than you (such as a gift) by providing their names, mobile numbers, email IDs and

addresses. We rely on you to obtain the intended recipient's consent to our use of their personal information for these limited purposes.

6. Usage data: We collect data about how you interact with our Platform. This includes data such as interaction patterns (such as screen actions, gestures: taps, scrolls) access dates and times, App features or pages viewed, App crashes and other system activity, type of browser, and third-party sites or services used before or in the course of interacting with our Platform.
7. Device data: We collect data about the devices used to access our Platform, including the device IP address, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.
8. Data collected through cookies: In simple terms, "cookies" are data collectors on websites. Cookies usually collect information regarding user settings such as language and special preferences. They also collect other miscellaneous information such as the time you spend on our Platform. Information collected through cookies is used to analyse how you interact with our website, how well you respond to marketing promotions, and to make your shopping experience safer. You are free to disable our cookies on your browser, but that may prevent you from accessing all the features of our Platform. Disabling our cookies may also require you to re-enter your account (in the event you have one) password over and over.
9. Information collected through advertisements: Our Platform may use third party advertising companies to serve ads when you visit our Platform. The data regarding the way you interact with these ads is also collected, analysed and stored by us. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Policy does not cover the use of cookies by any such advertisers.

#### *B. How do we use your information?*

1. Your personal information may be used for Company's legitimate business interests in connection with your use of the Platform, including your registration, confirmation of your order, your delivery information, response to user inquiries and fulfil user requests, completion of transactions, providing customer service, sending administrative information, and to personalize user experience with the Platform. We may use this information to better understand our users in general and to improve the content and functionality of the Platform. We may use information to investigate and prosecute potential breaches of Company security or license agreements.
2. From time to time, we may use your email address to send you information and keep you informed about the Products and Offers in which you might be interested. Your contact information may also be used to reach you regarding issues concerning your use of our Platform, including changes to this Policy.

3. When you provide us with personal information about other people, (for example, you may provide us with a name and address for a merchandise gift recipient), we use that information for the purposes of processing the delivery and, in some cases, to communicate with the intended recipient with information pertaining to the status of the delivery. We rely on you to obtain the intended recipient's consent to our use of their personal information for these limited purposes.
4. The financial and KYC information collected by Paytm is used for facilitating payment. If they have trouble processing an order, they may contact you by e-mail.
5. We may occasionally contact you with our updates, newsletters, greetings, events and seminars that we hold, which we refer to as Marketing Communications. Further, we may use your personal information to respond to your inquiry or process a recruitment request application form you have consented to and completed on our Platform.

*C. Do we share your personal information with third parties?*

1. We do not sell the personal information of our customers to others. We also do not share such information with third party business entities for their marketing or advertising purposes, unless you explicitly allow us to do so.
2. In certain cases, it is necessary for us to share your information with third parties. Such third parties may be:
  1. Third party service providers: Our business operations involve many third-party organisations and individuals in the performance of our functions. We may disclose to third party service providers certain personally identifiable information such as name, member ID, email, mobile number, address or the information we collect from your access and use of our Platform, including device information, location and network carrier. Further, these third party service providers may use cookies on our behalf and may receive information about your browsing and buying activity. This information is shared with third party service providers so that we can personalize the Platform for you, perform behavioural analytics and understand consumer patterns for the Platform. This information is further shared with the logistic companies and payment service providers for facilitating the delivery of Products and payment on the Platform.

We contract with third parties to serve ads on our behalf across the internet and sometimes on our Platform. They may collect anonymous information about your visits and your interaction with our Platform. They may also use information about your visits to target advertisements for goods and services. This anonymous information is collected through the use of a pixel tag, which is an industry standard technology used by most major websites. No personally identifiable information is collected or used in this process.

2. Government/Law enforcement: Your personal information may be disclosed to governmental authorities or law enforcement in good faith that such disclosure is necessary to prevent, detect or investigate any illegal activities related to our Platform. Such disclosure may also be done in order for us to fulfil any legal obligations that may arise. Further, we may share your personal information in order to investigate, defend or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
  3. Associated business entities: The Company may share your personal information with its affiliates and group companies for offering relevant products and offers to you. If the Company and its assets are wholly or substantially acquired by a third party in future, customer information will be one of the assets that may be transferred. This transition will take place with full disclosure of this Privacy Policy and the commitments expressed herein.
  4. Third Party Services: The Platform may allow you to connect with other websites, products, or services that we don't have control over (for example, if we allow you to pay through an external wallet facility then we will have to share your usage information with the facility provider). However, usage of such third-party services is subject to their privacy policies and not within our control. We recommend that you have a look at their privacy policies before agreeing to use their services.
3. The third parties who work on behalf of Company are subject to strict confidentiality agreements. Additionally, they are not allowed to share this information with anyone except on a need to know basis required for carrying out their functions.

#### *D. How do we protect your personal information?*

The Company limits access to personal information to authorized employees, associates, partners and officers. Additionally, our third-party service providers are held to stringent standards of privacy and confidentiality. We maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure.

Some of the other central features of our information security program are:

1. The use of specialized technology such as firewalls.
2. Testing of the security and operability of products and services by the IT department before they are introduced to the internet, as well as ongoing scanning for publicly known vulnerabilities in the technology.
3. Implementing controls to identify, authenticate and authorize access to various systems or sites
4. Restricting use of external data devices on Company's systems
5. Providing Company's personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

However, we cannot guarantee the privacy of personal information you transmit over the web or that may not be securely transmitted.

*E. What are your rights regarding the personal information collected by us?*

It is important for us that you remain in control of your personal information. If you would like us to modify, delete or withdraw consent regarding the use of any personal information collected about you, please send an email to [info@grubsoul.com](mailto:info@grubsoul.com) with 'REMOVE' mentioned in the subject line. However, you may not be able to use our Platform at all after such deletion or withdrawal of consent.

*F. Data retention*

We shall only retain your personal information to facilitate your smooth and uninterrupted use of the Platform. We do not retain your personal information for longer than required for the purpose for which the information may be lawfully used.

*G. Children's privacy*

Our Platform is not meant to be used by children, and we do not knowingly solicit or collect personal information from persons under the age of 18 (eighteen). If we find out that a child has given us personal information, we will take steps to delete that information and terminate the relevant user account.

*H. Grievances*

Should you have any grievances about the processing of your personal information, you may contact:

Emerald Deli Hub Private Limited

Reg Office: Y-38, Okhla Industrial Area Phase 2, New Delhi, India

Email: [grubsoulraw@gmail.com](mailto:grubsoulraw@gmail.com)

Time: Mon - Sat (10:00 - 18:00)

All email messages sent to and from the Company may be monitored with the objective of ensuring compliance with internal policies and to protect our business.

This document is an electronic record in terms of Information Technology Act, 2000 and rules there under as applicable and the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures.