

## **VIBSL PRIVACY POLICY**

This Privacy Policy describes the personal information we collect from you through our website and/or applications, It also describes the purposes for which we collect that personal information, the other parties with whom we may share it and the measures we take to protect the privacy and security of your data. It also tells you about your rights and choices with respect to your personal information, and how you can contact us about our privacy practices.

This Policy explains the collection, use, protection, disclosure, sharing and transfer, if any, of “personal information” by Us. Your registration or usage of VODAFONE IDEA BUSINESS SERVICES LIMITED’s services/ Vi Shop marketplace platform/ Vi Movies & TV mobile application/platform implies your express consent (i.e. You have read and understood the terms of this Privacy Policy and have accepted the same) and agreement to this Policy. VIBSL will no longer be able to provide you services if this consent is withdrawn.

### Detailed section:

PLEASE READ THIS POLICY CAREFULLY. “YOU” AND “YOUR” SHALL REFER TO THE CUSTOMER LIMITED TO CORPORATE ENTITY, BRANDS, FIRM, USERS, SELLERS, OTT CONTENT PROVIDERS, PLATFORM PROVIDERS, PARTNERS, VENDORS, AFFILIATES, HOLDING COMPANY OF VODAFONE IDEA BUSINESS SERVICES LIMITED’s PRODUCTS AND SERVICES/ VI SHOP MARKETPLACE PLATFORM/ VI MOVIES & TV MOBILE APPLICATION/PLATFORM , “WE,” “OUR” OR “US” SHALL REFER TO VODAFONE IDEA BUSINESS SERVICES LIMITED (hereinafter ‘VIBSL’).

We reserve our right to amend this Policy from time to time based on the changes in business, legal, regulatory requirements & applicable laws. You are encouraged to periodically visit this page to review the Policy.

This Policy is provided for Your information and is not intended to limit or exclude Your rights under laws and regulations applicable in India.

### Detailed section:

#### **1. Collection of Personal Information:**

- a. The Information Technology Act 2000, its subsequent amendments, and The Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 includes extensive definitions for Personal Information and Sensitive Personal Information and Payment Application Data Security Standard (PA-DSS) and Digital Personal Data Protection Act 2023 its subsequent amendments and rules. For the purposes of this Policy, Personal Information (PI) means any information relating to a natural person that

could be used directly or indirectly in combination with other information available with Us and is capable of identifying a natural individual.

- b. Personal Information (PI) does not include information that is anonymous, aggregated or is no longer identifiable to a natural person and such information is classified as Non-Personal Information.
- c. We may collect PI pertaining to:
  - i. Entity name, User first name, last name, office address, state, GST (optional), email ID, domain name, MSISDN and other information if You register with us. Any information used for creating an account for You shall be construed as Your Information.
  - ii. Your use of Our systems, products and services e.g. message history, including phone numbers.
  - iii. You authorize Us to get access of such personal data from VIL if you are a Vi mobile subscriber.

## 2. **Use of Personal Information:**

- a. The information that we collect from you will be processed only for the purpose of providing the services to You and will be held and used in accordance with applicable laws and regulations in India. It may be used to:
  - i. verify your identity before providing services
  - ii. send you notifications
  - iii. facilitate your payments
  - iv. respond to your technical query
  - v. contact you/respond to you regarding matters relevant to the underlying services
  - vi. generate bills and statements of use
  - vii. to send periodic e-mails to respond to your inquiries, questions, and/or other requests and keep you informed about our latest products, services and offers and that of our carefully selected third parties .
  - viii. to respond to services or product related queries
  - ix. Carry out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution ;
  - x. to action out legal, governmental or regulatory requirement
  - xi. Other usages that you may have expressly consented to.

Use of Non-personal Information:

Non-personal information can be used to deliver services based on your interests including verifying your identity as an organization, for analyzing different trends and determining the performance of these services.

## 3. **How long do we store Your data?**

- a. We may retain Your information for so long as We are obligated to as per the legal, regulatory directions for the time being in force.
- b. If there is no legal requirement, we may only store Your information for as long as we have the justified business requirement and we need it for providing services to you.
- c. After that, we will destroy it by making it unreadable or undecipherable with appropriate regard to privacy and security.

#### **4. How do We Protect Your Personal Information**

- a. We will strive on best effort basis to ensure the security of Your information. Access to Your Personal Information, within VIBSL is restricted and shared with VIBSL personnel on a need-to-know basis. All VIBSL personnel are obligated to protect confidentiality and ensure security. We adopt reasonable security practices and procedures, in line with international standard IS/ISO/IEC 27001 administered by specialized security teams to include technical, operational, managerial, and physical security controls in order to protect Your personal information. It may suit You well to note that no data transmission over the Internet is completely secure and for reasons outside of our control, security risks may still arise.
- b. We also take steps to ensure that our contracted third parties adopt reasonable level of security practices and procedures to ensure security of personal information.
- c. We cannot protect any information that you make available to the general public in any publicly accessible area of our website or any other media.

#### **5. Disclosure, Sharing and Transfer of Personal Information**

- a. VIBSL may use third party service providers to operate business and the Website or administer activities on VIBSL's behalf, such as providing Services, facilitating payments or calculating tax. VIBSL may share your Personal Information with these third parties if needed to carry out the obligations and provide you with the services in an efficient manner. VIBSL may also share your personal information with VIL. Except as otherwise described in this Policy, VIBSL will not disclose Personal Information to any third party unless required to do so by law or if such action is necessary to conform to the law, comply with legal process served on VIBSL or affiliates or investigate, prevent or act regarding suspected or actual illegal activities; to enforce VIBSL's Terms of Use, take precautions against liability, to investigate and defend VIBSL against any third-party claims or allegations, to assist government enforcement agencies, or to protect the security or integrity of the Website; and to exercise or protect the rights, property, or personal safety of the Company, our users or others.
- b. VIBSL may share your Personal Information with Sellers for enabling/fulfilling the provision of digital products/services of the Sellers to You.
- c. VIBSL may share your Personal Information with OTT content providers for enabling/fulfilling the provision of content to You.
- d. VIBSL may share Your Personal Information with its affiliates or holding company.
- e. We may store Your PI within the territorial limits of India or outside India to fulfill the terms of service we provide to you or if you have consented (at the time of collection of information) to the same.

#### **6. Use of cookies and technologies**

a. Please read this cookie statement carefully. “you” and “your” shall refer to the customer or subscriber or user or visitor of the Vodafone Idea Limited website [www.myvi.net] or Vi applications. “we,” “our” or “us” shall refer to Vodafone Idea Limited, providing or offering services to You or customer or subscriber of the Vodafone Idea Limited. This Cookie Statement is a part of and subject to the Privacy Policy. This statement explains the collection and use of various Cookies by Us. We periodically update and revise this Cookie Statement and would strongly urge you to revisit this page from time to time.

b. What are Cookies?

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device that enable our website platforms to remember You as per Your usage of Our platforms. They also allow Us to provide You with a personalized/ customized and quick feed for an enjoyable experience.

c. What are the different types of Cookies used?

- i. We may sometimes use a persistent cookie to record details such as a unique user identity and general registration details downloaded on Your Personal Computer. This helps Us recognize You on subsequent visits to this website so that You don't have to re-enter Your registration details each time you visit Us.
- ii. During the usage of our mobile apps' platforms, We may collect and use Device Identifiers (unique random number) called Advertising/Device ID typically assigned by the mobile operating system software. Device Identifiers are used by the mobile advertisement networks to identify and remember Your device uniquely to send you personalized marketing communications or advertisements.

### **How do we use the information collected through Cookies?**

- i. Using cookies and device identifiers, we may compile information about Your usage of our website and gain insights as to where You, or others who are using Your computer or mobile devices, saw the advertisements and determine which advertisements are clicked. This information allows our advertising partners to deliver personalised advertisements that they believe will be of most interest to You.
- ii. We do not have access to or control of the cookies /device identifiers that may be placed and used by third party applications, websites, or platforms. These third-party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these third-party sites. Nonetheless, we seek to protect the integrity of our website/applications.

### **How can You 'opt out' of Cookies?**

Most browser technologies (such as Internet Explorer, Chrome, etc.) allow You to choose whether to accept cookies or not. You can either refuse all cookies or set Your browser to alert You, each time a website tries to set a cookie. Most mobile operating systems allow users to reset the Advertising/Device ID by selecting the 'Ads' setting to 'limit tracking' on their mobile devices. This would amount to opting out of cookies used for targeted advertisements. In case You choose to disable/refuse the cookies certain functionalities on the website may not be available, which may impact the services we may provide to You

7. **Other Scenarios:**

- a. We may disclose Contact Information in special cases where we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our terms and conditions of use or may be causing injury or interference with our rights, property, our customers or anyone who could be harmed by such activities.

8. **Contact Us**

We are committed to safeguarding Your personal information collected and handled by Us and look forward to Your continued support for the same. In case of any feedback, concern or grievance regarding protection of Your personal information, you may reach us by contacting our **Data Privacy Officer** at [privacyofficer\\_VIBSL@vodafoneidea.com](mailto:privacyofficer_VIBSL@vodafoneidea.com).

I hereby acknowledge that I have read this privacy notice and consent for my data to be collected, processed, shared and stored by VIBSL in accordance with the procedures and policies mentioned herein.