

## ONLINE PRIVACY POLICY

### INTRODUCTION

BI WORLDWIDE ("BIW") complies with the U.S.-Swiss Safe Harbor Framework, and the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information or data obtained from individuals of Switzerland and the European Union. BIW has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view BIW's certification, please visit [Safe Harbor Website](#).

BIW controls this site and treats the privacy of individuals registering on this site with the utmost importance. This online privacy policy ("**Privacy Policy**") discloses the current privacy practices employed by this site. This **Privacy Policy** addresses how BIW uses and protects the information that BIW collects directly from you, receives from your employer or the company sponsoring this website and the underlying program ("**BIW Customer**") as part of the services provided by BIW. This **Privacy Policy** does not apply to the practices of companies and their employees with whom this site is not affiliated by ownership or control.

BI Worldwide India ("BIW"), collect, process and use information of our users (hereinafter addressed as "you", "your", "yourself"). We are the operator of the portal that provides you the opportunity to redeem your rewards and a provider of a range of services thereto. We provide a platform where we may list offers for local services, goods and travel which are made available by us or other vendors (collectively: "**Vendors**"). This Privacy Policy applies to information that we collect through our portal, electronic communications or services (collectively, the "**Portal**").

We will routinely update this Privacy Policy to improve our practices and to reflect new or different privacy practices, such as when we add new services, functionality or features to the Portal. You can determine when this version of the Privacy Policy was adopted by referring to the "Effective Date" above.

By visiting this Portal you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree, please do not use or access our Portal.

By mere use of the Portal, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the [Terms of Use](#) and [Terms and Conditions](#).

### PURPOSE OF DATA COLLECTION

Individuals may be requested to provide Personally Identifiable Information ("**PII**") and/or Sensitive Personal Information ("**SPI**") during the use of this site to enable BIW to fulfill the requirements of the services provided by BIW ("**Underlying Program**"). "**PII**" refers to information that is (a) about, or pertains to a specific individual; (b) can be linked to that individual; and (c) is captured in any form. Examples of **PII** include, but are not limited to, name, home address, email, etc. "**SPI**" refers to personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, social security number or other government issued ID, credit card number, or information that concerns an individual's health. "**PII**" and "**SPI**" is collectively referred to as "**Information**".

**PII** collected from individuals is used to create and administer individual accounts, including for purposes of account verification if an individual loses or forgets their password. **PII** may also be used to contact an individual

via e-mail or print communications regarding special promotional offers, or may be used to contact an individual regarding any issues that may arise during the operation of this site or the underlying program.

**PII** may be used for purposes of delivery of awards to individuals. If this site includes the ability to redeem points for, or receive merchandise or travel awards, the individual will, as appropriate, receive communications with information about the transaction (such as order or shipment confirmation) or special promotions. An individual's phone number may be required in the event that an individual needs to be contacted if there is a problem with an order.

When an individual logs onto the internet, the individual will be assigned an IP (Internet Protocol) address by an ISP (Internet Service Provider). Web sites can determine the IP address an individual is using when accessing the site. The IP address may be used to help diagnose problems with this site, or for security purposes.

### **Sensitive Personal Data and Information (SPDI)**

Pursuant to the Information Technology Act, 2000, we are required to give a disclosure of the SPDI collected by us and how do we use it. We may collect and retain the following information from and about you if you interact with us through the Portal:

- your email address and Portal password;
- your phone numbers;
- your location, portal browsing patterns (e.g., through cookies) and order history;
- other information you actively submit to us or we can determine about you based on your interactions with our Portal and services.

We get access to such information when you:

- register, subscribe, authorize the transfer of, or create an account with us;
- open or respond to emails;
- provide information to enroll or participate in programs provided on behalf of, or together with other vendors, merchants, co-marketers, distributors, resellers and other business partners, with your consent or as necessary to provide services you have requested;
- order products or services on or through the Portal; and
- post comments to the Portal.

## **ACTIVITY TRACKING**

The site may track and analyze non-identifying, aggregate, usage and quantifiable statistical information from visitors ("**Statistical Information**") in order to constantly improve the quality of service and site performance. **Statistical Information** gathered includes items such as: the activity of your browser when you are viewing the site, the site path of your visit, and the time of day you visit the site. **Statistical Information** is not **PII** or **SPI**; only general information regarding activity within the site. **BIW** reserves the right to share **Statistical Information** with **BIW Customers**. This site ignores web browser "do not track" signals. This site does not pass along **PII** to third parties as part of any tracking technologies developed by BIW.

**BIW** uses Google Analytics tracking technologies or activities arising out of them in conjunction with this site.

See [Google Analytics](#) for more information about Google Analytics

To opt-out of Google Analytics for the web, visit the Google Analytics opt-out page at [Google Analytics Opt-Out](#) and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser.

Demographic and other individual profile information beyond that gathered during enrollment may also be requested via optional surveys or other site promotions or gathered from analysis of aggregate data or information from the site. This information may be used to deliver relevant, targeted offers to individuals and is not required to use this site.

## USE AND TRANSFER TO THIRD PARTIES OF PERSONAL INFORMATION

**PII** and **SPI** will not be sold or provided to any third parties except as provided in this **Privacy Policy**, requested by you, or as may be required by law. You have the right to "opt out" if you do not want your **PII** transferred to third parties as necessary to operate the **Underlying Program**, but your experience and/or participation in the **Underlying Program** may thereafter be limited. **BIW** will not transfer **SPI** to third parties unless you first receive an express "opt in" choice.

The use by, and disclosure to third parties of **PII** and/or **SPI** in conjunction with the operation and management of this site or **Underlying Program** is restricted to necessary functions of this site and for the performance of the **Underlying Program** by **BIW** for **BIW Customer**, and is limited to the least amount of **Information** necessary for that third party to perform its function. Examples: An individual's name and address may need to be shared with a third party shipping company, or a credit card number may be required by a payment processing company. **Information** will not be disclosed to a third party unless the third party subscribes to the Safe Harbor Privacy Principles, or **BIW** has entered into a written agreement with such third party requiring the third party to provide at least the same level of privacy protection as required by the relevant principles.

### Use of Information

We process personal data for the following purposes:

- Operate, maintain and improve the Portal;
- Answer your questions and respond to your requests;
- Send you reminders, technical notices, updates, security alerts, support and administrative messages, service bulletins, marketing messages, and requested information, including on behalf of business partners;
- Administer rewards, surveys, contests, or other promotional activities or events;
- Manage our everyday business needs, such as administration of the Portal, analytics, fraud prevention, and enforcement of our corporate reporting obligations and Terms of Use or to comply with the law;
- Comply with our legal obligations, resolve disputes, and enforce our agreements;
- Allows you to sign up for special offers from merchants and other business partners through the Portal; and to
- Enhance other information we have about you to help us better understand you, determine your interests and provide you with more relevant and compelling services.

## **Disclosure of Information**

We are not in the business of selling or renting personal data. We will not share your personal data, except in the following manner:

- With the Vendors, so they can serve or deliver to you;
- As necessary to perform contractual obligations towards you with business partners to the extent you have redeemed a BIW voucher or points, goods or services offered by a business partner or participated in an offer, rewards, contest or other activity or program sponsored or offered through us or the vendor on behalf of a business partner;
- In case of a merger, acquisition or reorganization with a redemption of our company or all or substantially all of our assets;
- to comply with legal orders and government requests, or as needed to support auditing, compliance;
- to combat fraud or criminal activity, and to protect our rights or those of our affiliates, business partners and users, or as part of legal proceedings affecting BIW;
- in response to a legal process, including to law enforcement agencies, regulators, and courts; or
- with your consent or as otherwise required or permitted by law.

We encourage business partners to adopt and post privacy policies. However, while we share personal data with business partners only for the above-mentioned purposes, their subsequent processing and use of personal data obtained through BIW is governed by their own privacy policies and practices and are not subject to our control. We hereby assert and confirm that we shall not be liable for any claims in relation to data shared with a third party or any actions arising as a result thereof.

**Collection of Information:** We collect your personal data,

- When you register, subscribe, create an account, or redeem points or vouchers or otherwise contact us or communicate with us actively. For example, you provide personal data to us when you contact us online for customer service and other support using self-help tools, such as email, text, or by posting to online communities.
- When you interact with the Portal via cookies and other technologies as described on Cookies.
- Through other online and offline information from our business partners who may report to us redemption, collection, or refund-return events.

This Privacy Policy only addresses the collection, processing and use (including disclosure) of information by us through your interaction with the Portal. Your employer may have their own privacy policies and personal information collection, processing, use, and disclosure practices. Our business partners may also have their own privacy policies. We encourage you to familiarize yourself with the privacy policies provided by these other parties prior to providing them with information or taking advantage of a sponsored offer or promotion.

## INFORMATION PROVIDED TO BIW CUSTOMERS

When an individual enrolls in this site, an individual either completes an enrollment profile, or **BIW Customer** provides the data via a secure data file exchange. **Information** collected from the enrollment profile will be shared with **BIW Customers** except for coalition loyalty programs for which the following shall apply:

- Upon enrolling in a coalition loyalty program involving more than one **BIW Customer**, an individual shall have the choice to opt-in to receive informative emails about **BIW Customer** products and services directly from **BIW Customers**.
- If an individual chooses not to opt-in to receive informative emails, **BIW Customers** will not receive that individual's email address.
- Subsequent to enrolling, an individual may opt-in to receive **BIW Customer** emails through the site.
- The individual will need to unsubscribe from communications received directly from **BIW Customers** via the relevant message's unsubscribe link.

## COOKIES

This site may utilize "cookies" to improve individual experience on our site. Cookies are small bits of important information that are stored by the individual's web browser on the individual's computer hard drive. These cookies are used to enhance site usability and personalization, and to assist in site navigation. These cookies contain only information that an individual has supplied to this site. These cookies do not read other data from an individual's computer or share information with cookies from other sites. Cookies may remain on an individual's computer after the individual's web browser session has expired to assist an individual when the individual returns to this site.

Ads may occasionally be placed on this site. These ads may also contain cookies and appear to be coming from this site, but are in fact, coming from sponsoring customers or other parties who are presenting ads on this site.

You can configure your web browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Each web browser is different, so check the "help" menu of your web browser to learn how to change your cookie preferences. If an individual rejects all cookies, an individual may not be able to use some or all of the features of this site.

## SECURITY OF INFORMATION

Your information is stored on our servers located in the United States. We treat data as an asset that must be protected and we employ many advanced technical tools to protect your **Information** against unauthorized access and disclosure.

This site has security measures in place to help protect against the loss, misuse, and alteration of the information under its control. When you provide **PII** and/or **SPI** via the Internet, and you access the site using a web browser capable of supporting Secure Socket Layer (SSL) technology, your **Information** is protected by using both server authentication and data encryption. This site also employs a variety of other mechanisms to ensure that data you provide is not lost, misused, or altered inappropriately. These controls include, but are not limited to, firewalls, passwords, physical access controls, logical access controls, change control procedures, data confidentiality policies, and regular database backups.

This site restricts access to **PII** and **SPI** gathered through the site to employees who require access to **Information** for the purposes of administration. These employees are limited in number, and are bound by the

site's privacy and security policies. We also require that our employees execute comprehensive nondisclosure agreements with us to protect individuals' confidential information.

We use strict security measures to ensure the security, integrity and privacy of Your Personal Information and to protect your Personal Information against unauthorized access or unauthorized alteration, disclosure or destruction. For this purpose, we have adopted internal reviews of the data collection, storage and processing practices and security measures, including offering the use of a secure server to guard against unauthorized access to systems where we store your personal data.

We shall, however, not be responsible for any breach of security or for any actions of any third parties that receive Your Personal Information. Your data is also shared with several other business partners and vendors, we are not/shall be not responsible for their privacy policies or practices as it is beyond our control.

## REVIEW AND CHANGE OF PERSONAL INFORMATION

An individual can correct, amend or delete portions of their **Information** via the site interface or by utilizing their corporate update process, depending on how the original information was received. While reasonable efforts are made to ensure data integrity throughout all systems supporting this site, some **Information** may be transferred to other protected databases not connected to this site but controlled by **BIW**. As a result, some corrections, amendments, or deletions may take longer to process than others, but will occur within a reasonable timeframe. **BIW** takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete and current.

**User's Rights in relation to Personal Data:** By keeping your personal data updated you can help us to ensure that we can respect your preferences and offer you the goods and services that are most relevant to you.

- If You wants to update, rectify, and delete your information you provided to us in your profile need to be routed through BIW project team
- While we are ready to assist you in managing your subscriptions, closing your account, and removing your active profile, we cannot always delete records of past interactions and transactions. For example, we may be required to retain records relating to previous redemptions on the Portal for financial reporting and compliance reasons.
- **Retention of Personal Data**
- You can at any time deactivate your account with us by contacting BIW concerned SPOC. We will, however, retain your personal data for as long as your account is active or as needed to provide you services and to maintain a record of your transactions for financial reporting or other compliance purposes. We will also retain your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

- **Posting and Discussion boards**
- The Portal may contain connections to areas where you may be able to post information, communicate with others such as discussion boards or blogs, review products and merchants, and otherwise submit your own original content. Prior to posting in these areas, please read our [Terms of Use](#) carefully. All the information you post may be accessible to anyone within your organization and ours, and any information you include in your posting may be read, collected, and used by others. BIW stands indemnified by you against any claims arising out of or in regard to any such posts.

## ACCEPTANCE OF PRIVACY POLICY TERMS AND CONDITIONS

By visiting this site, individuals agree to the practices described in this **Privacy Policy**. To the extent that any of the third-party sites accessible through this site have different privacy practices from those stated in this **Privacy Policy**, those third-party privacy practices govern the collection and use of information an individual provides when visiting those sites. **BIW** is not responsible for the security or privacy practices of these other sites, the products or services offered by these other sites, or the content appearing at these other sites. If you access a linked site, it is your responsibility to read the policy statement of the other site to understand their policies, and to act accordingly to keep your **Information** private and confidential.

## CHANGES TO THIS ONLINE PRIVACY POLICY

On occasion, it may be necessary to change the terms and conditions of this **Privacy Policy**. To ensure that an individual is aware of current privacy practices, it is recommended that individuals check this site's **Privacy Policy** periodically. This site will not materially expand how it handles previously collected information without providing notice, and the choice to opt-out as appropriate, to individuals before the **Privacy Policy** is materially expanded.

## CONTACTING THE WEB SITE ADMINISTRATOR

In accordance with Information Technology Act 2000 and rules made there under, if you have any questions, inquiries or complaints regarding this **Privacy Policy** or the use of your **Information**, please use the "Contact Us" link on the site; contact us by mail at BI WORLDWIDE INDIA PRIVATE LIMITED, NO.28, Ulsoor Road, Bangalore 560042, Karnataka. India.