

## Privacy Policy

Effective as of July 01, 2019

Clufox Tech Solutions Pvt Ltd. (“Company”, “we”, “us” or “our”) knows that you care about how your personal information is used and shared while using our Product “READWIZ”. Please read the following privacy policy (the “Policy”) to learn more about our privacy practices. By visiting any of the websites operated by the Company, and any sub-domains thereof, or using any of our mobile applications and other methods of content distribution (collectively, the “Service”), you acknowledge that you accept the practices and policies outlined in this Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

### **1. Coverage of this policy**

This Policy covers Company’s treatment of personally identifiable information (“Personal Information”) and other information about you and your computer or device that Company gathers when you are accessing the Service. We may collect Personal Information from you, as explained in more detail below, and we use this Personal Information internally in connection with our Services, including to personalize, provide, and improve our products, services, content, and advertising, and to allow you to set up a user account and profile, to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Services. In certain cases, we may also share some Personal Information with third parties, but only as described in point 4.

We do not knowingly collect or solicit Personal Information from children under the age of 16. If you are under 16, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a child under age 16, we will delete that information as quickly as possible. If you believe that a child under 16 may have provided us personal information, please contact us at [support@clufox.com](mailto:support@clufox.com).

### **2. Information we collect**

**a.** We collect Personal Information you enter on or through the Service, such as when you create a READWIZ account, purchase a magazine/subscription, use our services or contact us.

When you create a READWIZ account, we collect your Name, Email address, Password and Gender (optional). We collect these basic details so that you can access your subscriptions on multiple devices. Also, when you change your device, these details will help you sync your READWIZ account and get access to your subscriptions.

When you purchase a magazine/subscription on our website, we additionally collect your Address (with Pin Code) and Card details in certain scenarios. This is done to validate the transactions and we shall clear such data when validations are no longer required. Please note that we don’t store your card details and they are stored only by the payment gateway. For

purchases made on our iOS/Android apps, we don't collect Address and Card details from the users.

- We collect your location details when you use our services for reading.
- When you contact us, we collect your email address to provide services and answer your queries.

**b.** The Personal Information we collect includes third-party account credentials (for example, your log-in credentials for Facebook, Twitter, Google or other third party sites).

**c.** We also collect information associated with your use of the application in order to make personalized recommendations. If you provide your third-party account credentials to us, you understand some content and/or information in those accounts ("Third Party Account Information") may be transmitted into your account with us if you authorize such transmissions, and that Third Party Account Information transmitted to the Service is covered by this Policy.

**d.** We may ask for additional information such as age, gender, and interests. You can choose not to provide us with certain information, but then you may not be able to take advantage of many of our special features. For example, we showcase personalized magazines and articles based on the interests you've selected.

**e.** The Personal Information we collect allows us to respond to your requests, improve our products and services, customize the advertising and content you see, and communicate with you about new products.

**f.** If you do not want to receive emails from us, you may opt out of Company's marketing and promotional messaging by changing the 'Email Preferences' under 'My Account' after logging in to your READWIZ account. However, while you maintain an account with Company, you will not be able to opt out of emails that send important notices, such as communications about purchases and changes to our terms, conditions, and policies.

**g.** We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personally identifying information for any purpose.

**h.** We receive and store certain types of information whenever you interact with the Service. Company automatically collects information on our server logs from your browser including your Internet Protocol (IP) address, the name and identity of your computer, mobile device and other devices, your operating system, browser type and version, CPU speed, connection speed, and locale information based on IP address. To the extent that IP addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. The Site collects usage information, such as the numbers and frequency of user visits to our website and its components, which magazines are added to the cart, which

magazines and articles are accessed through the Service, and the length and time a user may spend reading those magazines and articles. We use these information to give a personalized experience to our users and also improve our services. For instance, if you add a magazine to your cart and the payment fails due to some reason, we may send you an e-mail to complete the purchase with an alternate payment method.

i. We also collect information about your purchases and activities on the Service, which we may use to present you with offers that we believe may be of interest to you. As part of this use of information, we may provide non-personally identifying, aggregate information to our Participating Publishers and other third parties about how our users, collectively, use the Service.

- **Your searches** - To showcase more relevant keywords and results to you, and analyze trending keywords
- **Your downloads** - To verify if you have downloaded the magazines which you are permitted to access
- **Magazines you've visited** - To understand your interests and showcase more relevant magazines
- **Magazines you've read** - To understand your interests and showcase more relevant magazines
- **Articles you've read** - To understand your interests and showcase more relevant articles
- **Time spent on reading each magazine and article** - To analyze the quality of content and provide appropriate feedback to publishers
- **Web and app pages you've visited** - To track features used by you and recommend features that you've not used

j. We send push notifications to our apps after getting consent from our users. These push notifications inform users about the latest offers, new issues going live, personalized magazines and articles. The users can disable push notifications anytime.

k. We also track your interactions to our marketing initiatives such as which emails you have clicked and which push notifications you have tapped on, to understand your interests and improve our services.

l. We will also use usage information in order to ensure users adhere to our Terms of Use. For example, a user's usage information will help us confirm that a user only downloads a magazine or other content a permitted number of times or to a permitted number of devices.

**m.** You have the right to be forgotten by READWIZ. You can deactivate your account by visiting 'Edit My Profile' under 'My Account' and clicking on 'Deactivate my account'. We'll deactivate your account and delete all your data from our database within 30 days from the time we receive your deactivation request.

### **3. Cookie Policy**

- Cookies are alphanumeric identifiers that we transfer to your computer or device to enable our systems to recognize your browser and tell us how and when pages in our website are visited and by how many people.
- Most browsers have an option for turning off the cookie feature, which will prevent or limit your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. You may wish to leave the cookies activated because cookies enable you to take advantage of some of the Site's most essential features.

### **4. Sharing of your personal information**

- Personal Information will only be shared by Company to provide or improve our products, services, and to contact you about our services; it will not be shared with third parties for their marketing purposes.
- Others: We may access, read, preserve, disclose, or release Personal Information when we believe in good faith that release is necessary to comply with law and enforce or apply our Terms of Use; or protect the rights, property, or safety of Company, our employees, our users, or others.

### **5. Security of your personal information**

- We allow you to limit access to your account via a password for your privacy and security. If you access your account via a third party site or service, you may have additional or different sign-on protections via that third party site or service. You are responsible for ensuring against unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-on mechanism appropriately and limiting access to your computer and browser by signing off after you have finished accessing your account.
- **We use industry-standard Secure Socket Layer (SSL) software to encrypt your Personal Information during transmission.** However, because no data transmission over the Internet is completely secure, and no system of physical or electronic security is impenetrable, Company cannot guarantee the security of Personal Information in its possession or the security of its

servers or databases. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

- In the unlikely event that Company believes that the security of your Personal Information in its possession or control may have been compromised, Company may seek to notify you. If notification is appropriate, Company may notify you by email, messaging to your device, or other means within 72 hours of data compromise.

## **6. Personal information you can access**

- Company allows you to access the following information about you for the purpose of viewing, and in certain situations, updating that information: email address, name, location and marketing preferences. This list may change as the Service changes. The information you can view, update, and delete may change as the Website changes. If you have any questions about viewing or updating information we have on file about you, please contact us at [support@clufox.com](mailto:support@clufox.com).
- You can add or update certain personal information on your account, such as name and email address. When you update information, however, we often maintain a copy of the unrevised information in our records.
- Upon your written request to [support@clufox.com](mailto:support@clufox.com), we will remove your Personal Information from our active user database provided that (a) you are current with all payment obligations, (b) we do not believe it reasonably necessary to keep such information for any pending legal action, and (c) we are under no obligation to retain such information. Please be aware that any unfulfilled subscriptions may be cancelled without refund and you will have to re-register in order to use the Service. It is your responsibility to request a refund from us.

## **7. Changes to this Policy**

- Company may amend this Policy from time to time. Use of information we collect now is subject to the Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on the Service. You are bound by any changes to the Privacy Policy when you use the Website after such changes have been first posted.

## **8. Questions or Concerns**

- If you have any questions or concerns regarding privacy in connection with the Service, please send us a detailed message to [support@clufox.com](mailto:support@clufox.com). We will make every effort to resolve your concerns.