

# Privacy Policy

This privacy policy Effective from : 18 september 2020

This Privacy Policy was last updated on (date)

## **GENERAL**

Atmaveda Yog Private Limited, including all legal entities under the Atmaveda yog pvt ltd (hereafter referred to as "Atmavedayog" or "We"), respects your (customers - hereafter referred as "you" or "user") privacy and values our relationship with our business partners, clients, third parties having contractual relationship with Atmavedayog (hereafter referred to as "third party" or "service provider"), and any party who purchases/intend to purchase/inquire about any product(s) and/or service(s) made available by Atmavedayog through any of Atmavedayog' s customer interface channels including Website, mobile site, mobile app & offline channels including call centers and offices (collectively referred herein as "Services"). We are committed to protecting your personally identifiable information (hereafter referred as "information" or "personal information" or "personal data" or "special category of personal data") by handling it responsibly and safeguarding it using appropriate technical and organizational measures.

We want to assure you that we follow appropriate standards to protect your privacy on our Services. This policy outlines the types of personal information collected on our Website, how this data is used/processed and safeguarded as well as how users may exercise their rights with respect to personal information.

This Privacy Policy applies to Atamvedayog.com, Atmavedyog branded apps, Atmavedayog company pages, communications and services ("Services"), including off-site Services, such as our email services, customer care and support services and the "Contact us"; "Apply with Atmavedayog" and "Share on" plugins on our digital properties. By using or accessing the Website or other services, the user hereby agrees with the terms of this Privacy Policy and the contents herein.

However, in the event Atmavedayog is providing services to you as part of our agreement with your employer, contractor, business partner, affiliate or any other party who is having a contractual arrangement with Atmavedayog, then the terms and conditions stipulated in such contractual arrangement shall prevail over this data privacy policy.

For website(s), mobile sites and mobile apps of third parties, this privacy policy does not apply, even if their websites/products are linked to our Website. User should take note that the information and privacy practices of Atmavedayog business partners, advertisers, sponsors or other sites to which we provide hyperlink(s), may be materially different from this Privacy Policy. Therefore it is requested that you review the privacy statements and policies of any such third parties.

## **1. What Personal Data shall we collect?**

a. We collect the following personal and sensitive information from you when you transact through us:

- Name, gender, age and date of birth
- Contact information such as address, email, and mobile phone number
- Country of residence
- Credit Card details

- Lifestyle related information related to health and fitness
- Family details/information (for example, your marital status and dependents)
- Employment and education details (for example, the organization you work for, your job title and your education details) only in case of corporate client under corporate schemes.
- Postings or messages on any blogs, forums, platforms, wikis or social media applications of Atmavedayog and Atmavedayog's third parties
- IP address, browser type and language, your access times
- Information in any complaints you make
- Details of how you use our products and services
- CCTV footage and other information we collect when you access our premises
- Recording of telephone calls to our doctors, representatives and call centre's and
- Video recording of your online or offline consultation/sessions or video recording of your consultation and sessions in our clinic/ e clinic platform.
- Details of how you like to interact with us, and other similar information relevant to our relationship

b. The personal data we collect may also include 'special categories' of personal data such as details about your:

- Dietary Habits and requirements
- Health, fitness data
- Past/present medical history
- Past/present medical treatments taken
- Past/present medical diagnostic test reports
- Your comments on past /present treatment .
- Sex related information( related to medical diagnosis or psychological assessment).

c. If you choose not to provide, or object to us processing the information we collect, we may not be able to process your instructions or continue to provide some or all of our services to you (including our clients). Also it will affect in the future analysis related to health studies of of our clients .

If you provide personal information to us regarding individuals other than yourself, you agree To inform the individual about the content of this privacy policy

d. Personal information of child

The Services are not intended for users under the age of 18 (Permissible Age), unless permitted under applicable local laws. If you are under age of 18 yrs. Or the age of majority in the jurisdiction in which you reside, you may only use Our Website with the consent of your parent or legal guardian. In any case, we will not be liable for any cause of action that arose due to non-compliance of this section

e. The other information that we collect

- Analytics: Google Analytics, Apps flyer, Facebook Ads conversion tracking, Google Tag Manager, Intent Media, Adara
- Adobe Analytics: Cookies, Usage Data and various types of Data as specified in the privacy policy of the service.
- Infrastructure monitoring: Crashlytics- Geographic position, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and various types of Data as specified in the privacy policy of the service.

- Location-based interactions: Geographical locations
- Unique device identification: This Application may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

## **2. HOW WE COLLECT THE INFORMATION**

- a. From you directly and through this Site: We may collect information through the Website when you visit. The data we collect depends on the context of your interactions with our Website.
- b. Through business interaction: We may collect information through business interaction with you or your employees.
- c. From other sources: We may receive information from other sources , such as public databases ; joint marketing partners; social media platforms; or other third parties such as :
  1. Updated delivery and address information from our carriers or other third parties, which we use to correct our records and deliver your next purchase or communication more easily.
  2. Information about your interactions with the products and services offered by our subsidiaries.

## **3. HOW WILL WE USE/PROCESS YOUR PERSONAL DATA**

We do not sell or trade upon any of the above foregoing information without your consent. The foregoing information collected from you is put to the following use:

- a. We use the information we collect primarily to provide, maintain, protect and improve our current products and services.
- b. We use the information collected through this website as described in this policy and we may use your information to:
  1. Improve our services, Site and how we operate our businesses;
  2. Understand and enhance your experience using our Site products and services
  3. Personalize our products or services and make recommendations
  4. Provide and deliver products and services you request;
  5. Process, manage, complete and account for transactions;
  6. Provide customer support and respond to your requests, comment and inquiries;
  7. Create and manage the online accounts you manage on our Website;
  8. Send you related information, including confirmation, invoices, technical notices, updates, security alert's and support and administrative messages;

9. Communicate with you about promotions, upcoming events and news about products and services;

10. We may process your personal information without your knowledge or consent where required by applicable law or regulation for the purpose of verification of identity or for prevention, detection or investigation, including of cyber incidents, prosecution and punishment of offences;

11. Protect, investigate and deter against fraudulent, unauthorized or illegal activity.

#### **4.. PAYMENT AND TRANSACTIONS: through Easypay Pro a ICICI bank product**

A. For the purpose of booking to avail our services for you or for individuals whose information has been provided by you.

- Information like Credit Card Details and Net Banking Details that we store, in case a customer opts for it, are in adherence to the PCI Compliance and are stored in an encrypted form in a segmented zone. We do not store CVV details.
- These details may also be processed with the help of certain third parties only for the purpose of processing 'Cash Back & Discounts' and Charge Backs, if applicable.
- Information like Mobile number, e-mail address and postal address may be used for promotional purposes, unless the customer/user opts-out of such use.
- To manage and respond to any request you submit through our website.
- To meet legal and regulatory requirements.
- Promoting our professional services, products and capabilities to existing and prospective business clients/customers.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- The payment gateway integration services are provided by icici bank through their product Easypay Pro.

If you choose not to share this information, you can still visit our website, but you may be unable to avail certain options or our services.

#### **B. RETURN AND REFUND POLICY:-**

a. For consultation appointment payments done. It's a no refund policy . No cancellation of appointment. As the slot of appointment has been booked under your name, it remains unavailable for other person.

b. For online tests services , refund of payment is done only in case if the client is unable to do the test or has not undergone the test or has not submitted the test

c. For medicine and purchases made ,we have a no return policy. No refund will be made .

d. For treatment programmes. Only refund can be initiated for advised and services not availed by clients yet. As most of services involve monthly packaged and programme for month are already provided at starting week , no refund is applicable.

e. No refund on wellness/ health packages or treatment programmes charges paid.

f. Each client will be mailed a separate terms and conditions regarding his refund, payment schedule and cancellation according to the services or packages selected by him.

## **5. HOW WE USE COOKIES?**

a. To optimize our web presence we use cookies; these are small text files stored on your computer's main memory. These cookies are deleted after you close the browser. Other cookies remain on your computer (long-term cookies) and permit its recognition on your next visit. This allows us to improve your access to our site. This helps us to learn more about your interests and provide you with essential features and services and for additional purposes including:

1. Keeping track of items stored in your shopping basket.
2. Conducting research and diagnostics to improve the content, product and services
3. Preventing fraudulent activity
4. Improving security

b. Our cookies allow you to take advantage of some of our essential features. For instance, if you block our cookies or otherwise reject our cookies, you will not be able to add items to your shopping basket, proceed to checkout or use any products or services that require you to sign in.

c. Approved third parties also may set cookies when you interact with Our services.

d. Third parties include search engines, providers of measurement and analytics services, social media networks and advertising companies.

e. Third parties use cookies in the process of delivering content, including ads relevant to your interests, to measure the effectiveness of their ads and to perform services on behalf of us.

f. You can prevent the storage of cookies by choosing a "disable cookies" option in your browser settings. But this can limit the functionality of our services.

## **5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?**

A. Information about our user is an important part of our business and we take due care to protect the same.

B. We share your data with your consent or to complete any transaction or provide any product or service you have requested or authorized. We also share data with our affiliates and subsidiaries, with vendors working on our behalf.

C. We may employ other companies and individuals to perform functions on our behalf. The functions include fulfilling orders for products or services, delivering packages, sending postal mail and email, removing repetitive information from customer lists, providing marketing assistance, providing search results and links (including paid listings and links), processing payments transmitting contents, scoring credit risk, and providing customer service.

D. These third-party service providers have access to personal information needed to perform their functions but may not use it for other purposes. Further they must process the

personal information in accordance with this Privacy Policy and as permitted by applicable data protection laws.

E. We release account and other personal information when we believe is appropriate to comply with the law, enforce or apply our conditions of use and other agreements, protect the rights, property or safety of Us, our users or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction

## **6. HOW WE PROTECTS YOUR PERSONAL DATA?**

We have implemented appropriate technical and organizational measures to safeguard and help prevent unauthorized access to your information and to maintain data security. These safeguards take into account the sensitivity of the information that we collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. The third party with respect to payment gateway and payment processing are all validated as compliant with the payment card industry standard (generally referred to as PCI compliant service providers).

We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access or other causes beyond our control. You play an important role in keeping your personal information secure. You should not share your user name, password, or other security information of your Yatra account with anyone. If we receive instructions using your username and password, we will consider that you have authorized the instructions.

## **7. HOW LONG SHALL WE RETAIN/ DISPOSE YOUR PERSONAL DATA?**

We seek to ensure that we only keep your personal data for the longest of:

- a. the period necessary for the relevant activity or services
- b. any retention period that is required by law
- c. the period in which litigation or investigations might arise in respect of the services

Please note: Even after your account is terminated, we retain your data for as long as we have a legitimate purpose to do so (and in accordance with applicable law), including to assist with legal obligations, resolve disputes, and enforce our agreements. We may retain and disclose such data pursuant to this Privacy Policy after your account has been terminated.

## **8.BROWSER CONTROLS**

Most browsers will allow you to see what cookies you have, and delete them on an individual basis or block cookies from any particular or all websites. Be aware that any preference you have set will be lost if you delete all cookies, including your preference to opt-out from cookies, as this itself requires an opt-out cookie to have been set.

## **9.SOCIAL BUTTONS**

The Website contains 'social buttons' to enable users to share or bookmark web pages. These are buttons for third party social media sites and these sites may log information about your activities on the Internet including on this Website. Please review the respective terms of use and privacy policies of these sites to understand exactly how they use your information.

## **10. WHAT ARE YOUR DATA PROTECTION RIGHTS?**

Your data protection rights are highlighted below:

- a. Right to Access – You may ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- b. Right to Correction – You may ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- c. Right to Erasure – You may ask us to erase (delete) your personal data after you withdraw your consent to process it, or when we no longer need it for the purpose it was originally collected and we shall erase your personal data, subject to the data retention requirements under the applicable rules, regulations, guidelines, law, by-law, to meet our legal/regulatory obligations.
- d. Right to Processing restrictions – You may ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- e. Right to Data portability – You may request portability of your personal data, which shall be limited to the transfer of information pertaining to the customer profile and transaction records, to another data controller.
- f. Automated Individual Decision-making – You may ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or significantly affecting you.
- g. Right to Object to Direct Marketing including Profiling – You may object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
- h. Right to Withdraw Consent – You may withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. However, this may lead to Atmavedayog not able to provide certain products or services to you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds, in such cases we will ensure that you are notified about the same without undue delay.

## **11. YOUR INFORMATION CHOICES AND CHANGES**

a. You can also make choices about the collection and processing of your data by Us. You can access your personal data and opt out of certain services provided by Us. In some cases your ability to control and access to your data will be subject to applicable laws.

b. You may opt of receiving promotions emails from Us by following the instructions in those emails. If you opt-out we may still send you non-promotional emails, such as emails about our ongoing business relationship. You may also send request about you got preferences, changes and deletions to your information including requests to opt-out of sharing your personal information with third parties by sending an email to the email address provided at the bottom of this document.

## **12. CHANGES TO THIS POLICY**

We may change this policy from time to time . If we make any changes to this policy we will change the “Last Updated” date above . Your continued use of our services after such changes have been published to our services constitute your acceptance of such revised policy. If you do not agree with these changes, you should discontinue your use of our Website.

## **13. NEWSLETTER**

a. Following subscriptions to the newsletter, your email address is used for our advertising purposes until you cancel the newsletter again. Cancellation is possible at any time. The following consent has been expressly granted by you separately or possibly in the course of ordering process:

(I am accepting to receive newsletter from this website), you may revoke your consent at any time with future effect. If your no longer want to receive the newsletter, then unsubscribe by clicking on unsubscribe option given in the email footer.

**14. If you have any concern about privacy or grievances with Us, please contact us with a thorough description and we will try to resolve the issues for you.**

**Contact details:-  
Shital Dhole  
Atmavedyog pvt ltd  
Sant tukdoji nagar  
Rahatini  
Pune 411017**

**Email: [sadanand.for.anand@gmail.com](mailto:sadanand.for.anand@gmail.com)**