

## **PRIVACY POLICY**

This Privacy Policy governs how we, Apollo 24|7 Insurance Services Limited, a Company duly incorporated under the provisions of the Companies Act, 2013, having its registered office at #19, Bishop Gardens, R. A. Puram, Chennai, Tamil Nadu - 600028, India (collectively, “Apollo”, “Company”, “we,” “us,” or “our”) collect, use, share and process your information, that you provide to us through your use of our Application and website [www.Apollo247Insurance.com](http://www.Apollo247Insurance.com) in the course of availing services that are made available on the said app and website (“Services”) as defined in the Terms and Conditions.

The Company, owner of the [www.Apollo247Insurance.com](http://www.Apollo247Insurance.com) website and app (“Website”/“App” respectively), respects your privacy, and is committed to maintain the confidentiality, integrity and security of all information of our users. This Privacy Policy describes how we collect and handle certain information which we may collect and/or receive from you via the use of this Website. Please see below for details on what type of information we may collect from you, how that information is used in connection with the services offered through our Website and relevant information shared with our authorized business partners only for the purpose of providing services as permissible under applicable laws. The Company seeks to comply with applicable legal requirements, including the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPDI Rules”) as amended from time to time.

Please read this Privacy Policy carefully. By accessing or using this Website/ App, you agree to be bound by the terms described herein and all the terms incorporated by reference. If you do not agree to all of these terms, do not use this Website/ App.

### **1. WHAT IS PERSONAL INFORMATION**

Personal information is that information which can be used to directly or indirectly identify you. It includes de-identified data that, when linked to other information available to us, would enable us to identify you. Personal data does not include data that has been irreversibly anonymized or aggregated so that we cannot identify you through it, even in conjugation conjunction with other information.

“**Sensitive Personal Data or Information**” means personal information of any individual relating to password; financial information such as bank account or credit card or debit card or other payment instrument details; physical, physiological, and mental health condition; sexual orientation; health information such as medical records and history; biometric information; any detail relating to the above as provided to or received by us for processing or storage. However, any data/information relating to an individual that is freely available or accessible in the public domain or furnished under the Right to Information Act, 2005, or any other law shall not qualify as Sensitive Personal Data or Information.

By signing up on the App or proceeding to the Website, and / or using our Services you represent that you voluntarily provide us with personal information including medical, financial and other information, and consent to their collection, use, and disclosure in accordance with this Privacy Policy. You also represent that you are duly authorised by any third party (including a child or an employee) whose information you share with us. We shall act as per your representation of authority and shall not make any independent enquiries to ascertain the veracity of your authorisation. In the event you do not have sufficient authorisation you shall be solely responsible for your acts and omissions including sharing of information with us by you and the consequential processing and actions taken by us in accordance with this Privacy Policy.

### **2. WHAT TYPES OF DATA DO WE COLLECT**

The Website/App, like many other websites, uses “**Cookies**”. Cookies are small data files that a website stores on your web browser. These are used for the purpose of storing your preferences, previous activities browsing activities, profiling, and tracking behaviour on this Website. By visiting the App or Website, you acknowledge, accept and expressly authorize the placement of cookies on your web browser. We recommend that you clear the cookies stored on your browser from time to time.

When you sign up or register on the App or Website to use our Services, and during the course of actual usage of our Services, the types of information that will be collected by us include the following:

- i. Contact information: Name, Address, Contact details, Email ID, Phone Number;
- ii. Demographic information: Gender, Date of Birth, Nationality;
- iii. Current Medical and physiological history.
- iv. Vehicle Details.
- v. Data regarding your usage of the Services such as search history and history of any insurance availed by you through the use of our Website or App;
- vi. Financial information such as bank account or other payment instrument details and billing information other than credit card or debit card or payment account number, subject to applicable laws;
- vii. Your browsing history including the URL of the site that you visited prior to visiting the Website as well as the Internet Protocol (IP) address of your computer (or the proxy server you used to access the World Wide Web), your computer operating system and type of web browser you are using, the name of your ISP;
- viii. Any additional information that you provide to us during the use of the Services, through any mode of communication or during any interaction with our employees, consultants, etc.,
- ix. Health information such as your medical records and history which you voluntarily provide;
- x. Information regarding your insurance coverage (such as your insurance carrier and insurance plan) which you voluntarily provide or is generated on availing any of the Services;
- xi. Information regarding your physical, physiological, and mental health condition which you voluntarily provide
- xii. Any other information that is collected or generated in the course of availing the Services;
- xiii. Any other detail relating to the above as voluntarily provided to us by you, for providing value-added service; and
- xiv. Any other information relating to the above which you may have shared with us prior to this Privacy Policy for availing any of the Services.

### **3. WHERE DO WE COLLECT YOUR DATA FROM**

- a. Any information that you voluntarily choose to provide to us through the App, Website, email, during interaction with us on call or chat, and other modes of communication;
- b. Data you have provided to any group company of the Company, affiliates, associates, subsidiary, and holding company of the Company, associates, and subsidiaries of holding company of the Company, to whom you have given consent for sharing of such information.

### **4. HOW DO WE USE YOUR DATA**

We use your personal information except information received from Google APIs for purposes that include the following:

#### **4.1. General (Availing of Insurance Policies):**

- a. Your registration for the purpose of receiving our Services, identification, communication, notification, and for the fulfilment of the Terms of Use;
- b. Administer or otherwise carry out our obligations in relation to any agreement with our authorized business partners in connection with our business operations and functions for the purpose of insurance solicitation, providing pre/post sale services, claims servicing and providing you any other services as permissible under applicable laws or any other insurance related purposes.
- c. Anticipate and resolve problems with any services provided to you.
- d. Offer group insurance cover and wellness corner offerings / health and wellness related information to your employer organization.
- e. To send you information about promotions or offers from Insurance Companies to the extent permissible under applicable laws. We might also tell you about new features or products.
- f. Addressing your requests, queries, and complaints, if any, pertaining to our Services; taking feedback, assisting you with the completion of transactions or other issues relating to the use of Services and other customer care-related activities;

- g. Leveraging services from various Insurance companies with whom we have tie-ups and customizing suggestions for appropriate Insurance products and services based on your preferences;
- h. Creating insights for corporate/business strategy and marketing operations;
- i. Developing machine learning algorithms and tools to improve targeting of services and other products and services;
- j. Contacting you to provide information on new Services, features, products, special promotions or offers with whom we have a tie-up and which are relevant to the use of the Services;
- k. Technical administration and customization of Website, and other general administrative and business purposes;
- l. Research (internal or otherwise), fraud, security, risk management, and analysis for the development and improvement of products and services including the provision of tokenisation services offered by Payment Aggregators/ Card Networks, etc. as per Card Networks Rules;
- m. Disclosure as required to government authorities in compliance with applicable laws;
- n. Carrying out our obligations in relation to any agreement with affiliate companies, our business partners, or contractors including, but not limited to, the provision of tokenisation services to Payment Aggregators / Card Networks / Card Issuers, on a global basis as necessary to provide the tokenisation services, or for compliance of applicable laws, regulatory requirements or investigations;
- o. Investigating, enforcing, and resolving any disputes or grievances;
- p. Any other purpose required by applicable law.

#### **4.2. For End Users only:**

- a. Creation and maintenance of records in electronic form in database for use by us and the Insurance companies to provide relevant services;
- b. Create your unified profile with analytics and insights generated through processing your personal information;
- c. Processing any orders/requests you may place using our Services.

### **5. HOW LONG WILL WE RETAIN YOUR DATA**

We store your personal information in accordance with applicable laws, which means we keep your data for as long as necessary to provide you with our Services or as may be required under any law. We shall store your personal information for lawful purposes only. We keep de-identified data for research and statistical purposes for a longer period.

If you close your account, we have no obligation to retain your data, and we may delete any or all of your data without liability. However, we may retain data related to you if we believe it may be necessary to prevent fraud or future abuse, if required by law, or for other legitimate purposes. We may continue to store your data in anonymized or de-identified form for analytical, research, or other purposes for which your information is collected as previously indicated.

### **6. DISCLOSURE AND TRANSFER OF YOUR DATA**

We may share, disclose and in some cases transfer your personal information except information received from Google APIs to such entities as required to provide Services to you, improve our Services, and provide value-added services or other third-party products and services, to the extent permitted by applicable law. These entities may be located outside India, which you hereby consent to. We require such entities to protect your information through equivalent security measures as we would adopt. An indicative list of entities we may disclose or transfer information except information received from Google APIs, is provided below:

- a. **Insurance Companies:** We will share the personal information as disclosed by you to the Insurance Companies with whom we have or may have in future, tie ups in order to provide you seamless Services and fulfil your requests for availing the Insurance Policies as offered through our Website and/or App.
- b. **Service Providers:** We share personal information with companies that provide Services on our behalf, such as website hosting, data storage, software services, email services, marketing, fulfilling customer orders, providing payment-related services including payment aggregation, data analytics, data mining, providing customer services, and conducting surveys, as permitted by applicable laws. These companies may be

located within or outside India, but in any case, are obligated to protect your data. We may also share information with employees, data processors, consultants, business partners, and technology partners on a need-to-know basis. Such entities would be contractually obligated to maintain confidentiality in relation to your data.

- c. **Business Affiliates:** We may disclose or transfer some of your information to entities in the Apollo group companies, affiliates, associates, subsidiaries, the holding company of the Company, associates, and subsidiaries of the holding company of the Company including foreign entities, and in particular group companies and affiliates who are involved in the provision of products and services and whose products or services we believe, may be beneficial to you. In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, asset sale, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal information to the relevant third party with the same rights of access and use.
- d. **Law Enforcement Agencies:** We may share information with law enforcement agencies pursuant to lawful requests for information, and otherwise as required under any law applicable at the given time, both in India and outside India including in response to a court order or to defend any claim filed/ to be filed against the Company .
- e. **Other Third Parties:**
  - i. We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users;
  - ii. We may disclose personal information to any third party if necessary to provide or improve our Services, fulfil any lawful contractual obligation we are bound by, and any other activity related to the purposes identified in this privacy policy and the terms and conditions you agree to when you use our Services; and
  - iii. Anonymised, aggregated data may be shared with advertisers, research firms, and other partners.

If you prefer that we should not share your Personal Information with any third party, you can notify us by reaching out at [support@apollo247insurance.com](mailto:support@apollo247insurance.com)

## 7. HOW DO WE PROTECT YOUR DATA

We are committed to maintaining the privacy of the information uploaded by you on the Website and complying with the industry-standard security safeguards for the purpose of securing the Website and the information provided/uploaded by you.

We use reasonable technical, administrative, and physical security measures for the purpose of safeguarding all data you share with us. We also have comprehensive internal policies in place to prevent unauthorized access to your data. We take adequate steps to ensure that third parties we share data with also adopt reasonable levels of security practices and procedures to ensure the privacy and security of your information.

However, we are not responsible for any loss, unauthorized access, safety issue, or any harm caused to you by any misuse of your personal information, unless it is a direct and foreseeable consequence of negligence and non-compliance on our part only. You hereby acknowledge that we are not responsible, in particular, for any third-party action or action on your part leading to loss, damage, or harm to you or any other person.

For any data loss or theft due to unauthorized access to your electronic devices through which you avail our Services, the Company shall not be held liable for any loss whatsoever incurred by you. Further, you are liable to indemnify the Company as per the Terms of Use.

## 8. WHAT ARE YOUR RIGHTS

We take reasonable steps to ensure that your personal information is accurate, complete, and up to date. However, you have the sole responsibility of ensuring that you review the accuracy of the information provided by you and contact us in case of discrepancies, or in case you wish to discontinue the use of our Services. You have the following rights with regard to your personal information:

- a. You have the right to access your personal information and request updation, correction, and deletion. If your personal information changes, you may correct, delete inaccuracies, or amend information by making the change on our member information page or by contacting us through [grievance.officer@apollo247insurance.com](mailto:grievance.officer@apollo247insurance.com). We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date, or incomplete (or subsequently becomes untrue, inaccurate, out of date or incomplete), or we have reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, we may, at our sole discretion, discontinue the provision of the Services to you. There may be circumstances where we will not correct, delete or update your personal information, including (a) where the personal information is opinion data that is kept solely for evaluative purposes; (b) the personal information is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed; and(c) where your information has already been processed in de-identified form.
- b. You are free not to share any medical or other information that you consider confidential and withdraw consent for us to use data that you have already provided. In the event that you refuse to share any information or withdraw consent to process information that you have previously given to us, we reserve the right to restrict or deny the provision of our Services for which we consider such information to be necessary.
- c. If you are no longer interested in receiving e-mail announcements and other marketing information from us, please e-mail your request at [support@apollo247insurance.com](mailto:support@apollo247insurance.com) Please note that it may take about 10 days to process your request.
- d. You may contact Mr. Prateek Tomar at [grievance.officer@apollo247insurance.com](mailto:grievance.officer@apollo247insurance.com) for any questions, concerns or suggestions or for the exercise of these rights. We will respond to your request within a reasonable time.
- e. In case your grievance is in relation to Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, we shall acknowledge your complaint within twenty-four hours and dispose of such the complaint within a period of fifteen days from the date of its receipt. Disposal of complaint shall include all actions as considered necessary by the Company.
- f. Mr. Prateek Tomar is also the Principal Officer / Nodal Officer or Designated Officer for complying with the Applicable laws including the Information Technology Act, 2000 as amended from time to time.

## 9. THIRD-PARTY WEBSITES AND SERVICES

Our Website and App may contain links to third-party services, and give you the ability to access such third-party websites, products, and services. Please note that you may proceed to the use of such third-party websites or services at your own risk and the Company will not be held liable for any outcome or harm arising as a result of your use of such third-party websites or services. Please read the privacy policies of any third party before proceeding to use their websites, products, or services.

## 10. COMPLIANCE WITH THE GOOGLE USER DATA POLICY

The Company use of information received from Google APIs will adhere to Google API Services User Data Policy including the Limited Use requirements and Limited Use Requirements shall apply to both raw data obtained from Restricted and Sensitive Scopes and data aggregated, anonymized, or otherwise derived from that raw data. Google API Services User Data Policy is available at [Google API Services User Data Policy | Google for Developers](#).

## **11. CHANGES TO THIS PRIVACY POLICY**

Any changes to our Privacy Policy will be posted on the Website/ App and will become effective as of the date of posting. Please review the Privacy Policy from time to time to make sure you are aware of any changes. If you do not agree with any such revised terms, please refrain from using our Services and contact us to close any account you may have created.