

AMSURE's PRIVACY POLICY

AmSure Insurance Agency Limited ("**Amsure**") has been a corporate agent, being in the business of insurance related services where directly or through its website www.amsure.in ("**Website**") or through other offline channels, it collects, receives, possesses, stores, deals and handles information provided by those customers (hereinafter referred to as "**Customers**", "**You**" or "**Your**") accessing the Amsure's services through the Website and through offline channels.

Amsure is committed to protecting the privacy of all users and visitors of the Website including its Customers and aims for the Website to be a safe and enjoyable environment for You. This document comprises Amsure's privacy policy ("**Policy**") which has been made available on the Website for perusal and viewing by You.

This Policy primarily describes:

- The information that Amsure collects through the Website, which is hosted and operated from India;
- The use and role of cookies and similar technologies on the Website; and
- The security measures Amsure has in place to protect the information that Amsure gathers through the Website.

This Policy does not govern Amsure's collection of information through any website, or by any other means, other than through this Website or the collection of information by any parent, or subsidiaries of Amsure ("**Other Entities**").

Customers and visitors to the Website are encouraged to read this Policy before using the Website. By using the Website, You agree to the terms and conditions of this Policy and the Usage Policy [http://www.amsure.in/usage_policy.asp] of the Website. If you do not agree to the terms and conditions of this Policy and the Usage Policy on the Website, please do not use the Website.

1. Information gathered by Amsure through the Website, other Offline Channels and Associated Service Providers

Amsure *may* collect the following information:

- (i) "**Personal Information**" which means any information that relates to a natural person through which a person can be identified, and which includes Sensitive Personal Data (as defined below), and
- (ii) "**Aggregate Information**", from which an individual cannot be identified. In some cases, personal identifiers from data provided by You are removed by Amsure and the data is protected in a combined form to produce aggregate statistical information (for e.g., to determine the number of visitors on the Website etc.).

1.1 You are not ordinarily required to register or provide Personal Information in order to access the Website. Amsure collects Personal Information from You only when you voluntarily provide it to Amsure - for example, through offline channels or associated service providers, in contacting Amsure through the Website, or applying online for a career with Amsure, exploring business opportunities with Amsure, answering surveys and polls, entering contests and similar promotions and signing up for email updates and announcements concerning Amsure's products and special sales and promotions. Personal Information may include Your contact information (such as your name, postal address, telephone numbers and/or email address) and other important information such as:

- (i) passwords;
- (ii) financial information such as bank account or credit card or debit card or other instrument details;
- (iii) details of an individual's physical physiological and mental health condition;
- (iv) sexual orientation;
- (v) medical records and history;
- (vi) biometric information;
- (vii) any detail relating to (i)- (vi) above that is provided to Amsure; and
- (viii) any of the information received under (i) – (vii) above for processing, which is stored or processed under lawful contract or otherwise by Amsure.

1.2 The information collected under (i) – (viii) in clause 1.1 above shall be collectively referred to as "**Sensitive Personal Data**". Sensitive Personal Data may be collected by Amsure's agents, representatives from You through Offline channels. This Sensitive Personal Data along with other Personal Information shall be prepared and stored internally in Amsure's computer systems or computer network. Amsure may collect any or all of the Sensitive Personal Data from its Customers from time to time. You shall be informed of the requirement for collection of the Sensitive Personal Data by Amsure at the time of its collection and your written consent by way of signature on the policy documents of Amsure or otherwise shall be deemed consent for Amsure to use the collected Sensitive Personal Data ("**Consent**"). Neither

Amsure, nor any person on its behalf shall publish Sensitive Personal Data in any manner whatsoever and shall only retain the Sensitive Personal Data only as long as is required for the purpose for which the information may lawfully be used by Amsure or is required to be retained by Amsure under any law for the time being in force.

However, if any information which forms part of the Sensitive Personal Data is freely available or accessible in the public domain or is furnished under the Right to Information Act, 2005, or any other law for the time being in force, then the same shall not be regarded as Sensitive Personal Data for the purposes of this Policy.

- 1.3 Your payment information, such as bank account details, credit card number and expiration date ("**Payment Information**"), will be provided by You at the time of obtaining insurance policies from Amsure and will also be collected by the respective banks and/or third party payment gateway, at the time of making online payments for such insurance policies. Such Payment Information being Sensitive Personal Data shall be protected by Amsure if the same is in the knowledge of Amsure or is being retained by Amsure in its computer systems. Such Payment Information shall not be retained by Amsure longer than is required for the purposes for which the information may be lawfully used by Amsure or as otherwise required to be retained by Amsure under any law for the time being in force.
- 1.4 Amsure shall not at any time be responsible for the authenticity of Personal Information or Sensitive Personal Data provided by Customers or visitors of the Website. Further, if at any time You wish to withdraw Consent, You shall intimate such withdrawal of Consent in writing to Amsure. In circumstances where Consent has been revoked, Amsure shall be entitled to discontinue all services/ products which are being provided to You on the basis of the Consent received earlier.

2. Information Automatically Collected on the Website

When You visit the Website, Amsure and the third parties with whom Amsure has contracted to provide services, may collect certain types of information as below:

- (i) Server Log Files - Your Internet Protocol (IP) address is an identifying number that is automatically assigned to your computer by your Internet Service Provider (ISP). This number is identified and logged automatically in Amsure's server log files whenever you visit the Website, along with the time(s) of your visit(s) and the page(s) that you visited. IP addresses of all Visitors are used by Amsure to calculate the Website usage levels, to help diagnose problems with the Websites servers, and to administer the Website. Amsure may also use IP addresses to communicate or to block access by Visitors who fail to comply with the Policy and/or the Usage Policy of the Website. Collecting IP addresses is a standard practice followed on the Internet and is carried out automatically by many websites.
- (ii) Cookies - Cookies are data that a web server transfers to an individual's computer for record keeping purposes. Cookies are an industry standard used by most websites, and help facilitate users ongoing access to and use of a particular website. Cookies do not cause damage to the computer system or files, and only the website that transfers a particular cookie to the computer system can read, modify or delete such a cookie. If you do not want your information to be collected through the use of cookies, there is a simple procedure to be followed, in most of the browsers, by the user that allows the user to delete existing cookies, automatically decline cookies, or to be given the choice of declining or accepting the transfer of particular cookies to the user's computer system. You should note, however, that declining cookies may make it difficult or impossible for you to access certain portions of the Website.
- (iii) Pixel Tags - The Website may use so-called "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "**Pixel Tags**") to compile aggregate statistics about Website usage and response rates. Pixel Tags enable Amsure to maintain a count of the users who have visited certain pages of the Website. When used in HTML-formatted e-mail messages, Pixel Tags can tell the sender whether and as to when the e-mail was opened and read by the receiver of the e-mail.

3. Amsure's Security Practices and Procedures

Amsure has implemented reasonable security practices and standards and has a comprehensive documented information security programme and information security policies in place which contain managerial, technical, operational and physical security control measures that are commensurate with the level of protection required for Amsure's nature of business.

4. Use and Disclosure of Information gathered by Amsure through the Website

- (i) Personal Information - Amsure may use a Customer's Personal Information in any of the following ways:

- a. Communications - Amsure encourages the Customers to contact Amsure with questions and comments. Personal Information may be used by Amsure in order to respond to a Customer's questions and comments regarding Amsure's products and services.
 - b. Business Purposes - Amsure may also use a Customer's Personal Information for internal business purposes, such as analysing and managing its business activities. The Personal Information collected from the Website may be combined with other information collected by Amsure via other online or offline sources, with demographic information and other information that is available in the public domain.
 - c. Transactions - Amsure may use your Personal Information or Payment Information in order to complete the transaction and, if applicable, to fulfil your purchases with Amsure. The Payment Information may also be shared with the third parties, as may be necessary, to complete your transaction (for example, to process the payment made through the credit card).
 - d. Contests, Competitions and other Sales and Promotions - Amsure may, from time to time, introduce and organize any contests, competitions and similar sales and promotions through its Website that may require online registration by You for participating in such contest, competition or promotion (which may include name, email, user ID and password). Amsure may ask you for certain Personal Information during the process of registration for participating in such contest, competition or sales and promotional schemes. Amsure may share this Personal Information with third party sponsors (including but not limited to insurance companies) of such contests, competitions and promotions (irrespective of whether the same is hosted by Amsure), in accordance with the rules applicable to such contest, competition or promotion. You should carefully review the rules of each contest, competition and promotion in which you participate through the Website, as they may contain certain additional important information about Amsure or the sponsors regarding use of your Personal Information. To the extent that the terms and conditions of such rules concerning the treatment of your Personal Information enlarge the scope of use of such information in terms of the Policy, the terms and conditions of such rules shall also apply.
 - e. Special Sales, Promotions, Orders and Product Information- Amsure reserves the right to use your Personal Information for sending you SMS notifications, letters, fax and e-mails of updates and announcements concerning Amsure's products and special offers, sales and promotions as also for future sales of Amsure products under various schemes, competitions and sweepstakes. In addition, Amsure may use your Personal Information to contact you via telephone regarding Your insurance policies, insurance providers and Your rights and obligations thereto.
 - f. You may opt-out of receiving these messages from Amsure any time (see Section 7 "**Choice**" below).
 - g. Critical Communications - Amsure may from time to time and as may be necessary use your Personal Information to send emails consisting of important information regarding the Website, your insurance policies with insurance agents, transactions, or for notifying any amendments or modifications to the terms, conditions, and/or policies of Amsure with respect to use of this Website ("**Critical Emails**"). Since Critical Emails would consist of important information you shall not have the option of not receiving Critical Emails.
 - h. Third Party Service Providers - Amsure works with third parties who provide services, including website hosting, credit card processing, data analysis, newsletter services, promotional activities, and other administrative services. Amsure may share your Personal Information, including your Payment Information, with such third parties, as may be necessary, for the purpose of enabling such third parties to discharge the provision of such services that are provided to you or Amsure as agreed under the Usage Policy, this Policy or otherwise.
 - i. Miscellaneous – Amsure may be required to disclose your Personal Information, if Amsure believes that it is required to do so: (i) by law; (ii) to comply with legal process or governmental requests; (iii) to protect its operations; (iv) to protect the rights, privacy, safety or property of Amsure, You or others; and (v) to enable itself to pursue the available remedies or limit the damages that it may sustain.
- (ii) Aggregate Information - Amsure may analyse Aggregate Information in order to enhance the Website security, track the popularity of certain pages of the Website, track success of its e-mail notifications, assess traffic levels on the Website and other usage data, all of which would help Amsure to provide content tailored to the interests of the consumers, improve the Website and related services and to otherwise enhance a Customer's experience on the Website. Amsure may also share the Aggregate Information with its Other Entities and other third parties for provision of such services.

- (iii) **Sensitive Personal Data** – Disclosure of Sensitive Personal Data or information by Amsure to any third party shall only be done after Your prior approval. You may note however, that in the case of a contractual agreement between You and Amsure, between You and Other Entities or between You and Amsure's other service providers, where You authorize the use and disclosure of Sensitive Personal Data in such contractual agreement by Amsure, Amsure shall not be required to obtain prior permission for the use and disclosure of Your Sensitive Personal Data. Amsure shall be further entitled to disclose Your Sensitive Personal Data, where the same is necessary for compliance of a legal obligation. You acknowledge and understand that such Sensitive Personal Information shall only be shared by Amsure with those government agencies mandated by law to obtain Sensitive Personal Data for the purposes of verification of identity, for prevention, detection, investigation including cyber incidents, prosecution and punishment of offences, and only when such government agency makes a proper written request stating clearly the purposes of seeking such information in writing to Amsure. Such third party government agencies shall not be entitled to disclose Your Sensitive Personal Data further.

Amsure shall also be obliged to share Sensitive Personal Data pursuant to any order under the law in force at the time of the request for such disclosure.

5. **Other important notes regarding Amsure's Privacy practices**

- (i) **Security** - Amsure has adequate security measures and tools in place to help protect against the loss, misuse, and alteration of the information under Amsure's control. Even though Amsure endeavours to protect its Customer's Personal Information, Amsure cannot guarantee the security of any information transmitted to Amsure, through or in connection with the Website. If you have reason to believe that your interaction with Amsure is no longer secure (for example, if you feel that the security of any account you might have with Amsure or any information submitted by you to Amsure has been compromised), you must immediately contact Amsure's **Grievance Officer** as below:

Name: Rajul Bansal

Telephone: +91 120 612 9860

Mail ID: rajul.bansal@amsure.in

Other Third Party Sites - The Website may contain links to third party websites. These linked sites (including the web sites of Amsure's Other Entities) are not under the control and supervision of Amsure and Amsure shall in no way be responsible for the privacy practices or the contents of any such third party linked websites, or any information contained in any linked websites. Amsure provides such links only as a convenience, and the inclusion of a link on the Website does not imply endorsement of the linked website by Amsure. If you furnish Your Payment Information or other Personal Information through any such third party website, your transaction will occur on such third party's website (and not the Website) and the Personal Information you provide will be collected by, and controlled by the privacy policy of that third party. It is important that you familiarize yourself with the privacy policies and practices of any such third parties, before furnishing any Personal Information or Payment Information on their websites.

- (ii) **Assignment** - Amsure reserves the right to transfer any and all information that it collects from the Customers to a third party in the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Amsure's assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

6. **Updating Your Information and Contacting Us**

Amsure has adequate procedures in place to keep your Personal Information accurate (based on regular confirmations at Your end), complete and up to date for the purposes for which it is collected and used. You may review the information maintained by Amsure and wherever appropriate, you may send a request to Amsure's Grievance Officer mentioned above for such information to be corrected. You may note that despite any removal of or change to Personal Information requested there may also be residual information that will remain within Amsure's databases and other records, which will not be removed or changed.

7. **Choice**

From time to time, Amsure may ask you to indicate whether you are interested in receiving e-mails, fax, letters, SMS notifications and telephone calls and other information from Amsure or not. If you elect to receive these communications, Amsure may occasionally contact you and provide information that match your requests and offer you promotions and coupons, including but not limited to contacting you to facilitate orders. If at any time you wish to stop receiving these communications from Amsure, you may put up a request for their discontinuation by e-mailing, calling or writing to Amsure using the contact information provided on the Website or by using the unsubscribe feature in the email(s) received by you. Please indicate that you wish to stop receiving communications from Amsure. However, you shall not have the option of discontinuing the receipt of Critical Emails from Amsure.

In addition to the above, Amsure does not disclose your Personal Information to third parties, including Amsure subsidiaries and the holding companies, for third-party's direct marketing purposes if Amsure has received and processed a request from You that your Personal Information should not be shared with third parties for such purposes. If You would like to submit such a request, You may do so by emailing, calling or writing to Amsure using the contact information provided above. Please indicate that you request that Amsure should not disclose your Personal Information to its subsidiaries and/or other third parties for direct marketing purposes.

8. Changes to this Policy

Amsure reserves the right to change this Policy, and any of its policies or procedures concerning the treatment of information collected through the Website, without prior notice. Any changes to the Policy will become effective upon posting of the revised Policy on the Website. Use of the Website following such changes constitutes your acceptance of the revised Policy, then in effect. Amsure encourages you to bookmark this page and to periodically review it to ensure familiarity with the most current version of the Policy.

9. Entire and only Policy

This Policy represents the sole, authorized statement of Amsure practices with respect to the collection of Personal Information through the Website and the manner of use of such information by Amsure. Any summaries of this Policy generated by third party software or otherwise (for example, in connection with the Platform for Privacy Preferences or "P3P") shall have no legal effect, shall not be binding on Amsure, shall not be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

10. Consent

By using this Website, you consent to the terms of this Policy and to the use and management of Personal Information and Payment Information, if collected, by Amsure for the purposes and in the manner herein provided. Should this Policy change, Amsure intends to take every reasonable step to ensure that these changes are brought to your attention by posting the updated Policy on the Website. Your visit and any dispute over privacy are subject to this Policy. The said Policy shall be governed by and construed in accordance with the laws of the Republic of India. Further, it is irrevocably and unconditionally agreed that the courts of Delhi, India shall have exclusive jurisdiction to entertain any proceedings in relation to any disputes arising out of the same.

11. Links to Other Sites

The Website contains links to a number of websites that may offer useful information to our visitors. This Policy does not apply to those sites and Amsure recommends communicating with those websites directly for information regarding their privacy policies.