

# PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING THE WEBSITE AND/OR MOBILE APPLICATION, YOU AGREE TO BE BOUND BY THE TERMS DESCRIBED HEREIN AND ALL TERMS INCORPORATED BY REFERENCE. IF YOU DO NOT AGREE TO ALL OF THESE TERMS, DO NOT USE THE MOBILE APP/WEBSITE.

## 1. Context & Purpose

1. The domain name [www.axiosbiocare.com](http://www.axiosbiocare.com), an internet based portal, and Axios Bio Care, a mobile application, is owned and operated by Axios Bio Care, a company duly incorporated under the provisions of the Companies Act, 1956 (hereinafter, referred to as “**Axios Bio Care**” or “**We**” or “**Our**” or “**Us**” or “**Company**”). The domain name and the mobile app are collectively referred to as “**Mobile Application**”.
2. The **Mobile Application** is a platform that facilitates the purchase of pharmaceutical products for sale by various relevant pharmacies (hereinafter referred to as “**Services**”, with the relevant pharmacies referred to as “**Sellers**”). The arrangement between the Sellers and Axios Bio Care shall be governed in accordance with this Terms of Use. The Services would be made available to such natural persons who have agreed to become buyers on the Website/Mobile Application after obtaining due registration, in accordance with the procedure as determined by Axios Bio Care, from time to time (referred to as “**You**” or “**Your**” or “**Yourself**” or “**User**”, which terms shall also include natural persons who are accessing the Website/Mobile Application merely as visitors). The Services are offered to the Users through various modes which shall include issue of discount coupons and vouchers that can be redeemed for various goods/ services offered for sale by the Sellers.
3. For the purpose of providing the Services and for other purposes identified in this Privacy Policy, Axios Bio Care will be required to collect and host certain data and information of the Users. Axios Bio Care is committed to protecting the personal information of the Users and takes all reasonable precautions for maintaining confidentiality of the User’s personal

information. This Privacy Policy has been designed and developed to help you understand the following:

- i. The type of personal information (including sensitive personal data or information) that Axios Bio Care collects from the Users;
  - ii. The purpose of collection, means and modes of usage of such personal information by Axios Bio Care;
  - iii. How and to whom Axios Bio Care will disclose such information;
  - iv. How Axios Bio Care will protect the personal information including sensitive personal data or information that is collected from the Users; and
  - v. How User's may access and/ or modify their personal information.
4. This Privacy Policy shall apply to the use of the **Mobile Application** by all Users / Sellers. Accordingly, a condition of each User's use of and access to the Website/Mobile Application and to the other services provided by Axios Bio Care to Users is their acceptance of this Privacy policy. Any User is required to read and understand the provisions set out herein prior to submitting any sensitive personal data or information to Axios Bio Care, failing which they are required to leave the Website/Mobile Application immediately.
5. This Privacy Policy is published in compliance of the (Indian) Information Technology Act, 2000 and the rules, regulations, guidelines and clarifications framed thereunder, including the (Indian) Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

## **2. What is personal information?**

1. Personal Information means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available with Axios Bio Care, is capable of identifying the person concerned.
2. 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; medical records and history; biometric information; any detail relating to the above as provided to or received by Axios Bio Care for processing or storage. However, any data/ information relating to an individual that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law shall not qualify as sensitive personal data/information.

### **3. Types of personal information collected by Axios Bio Care:**

1. A User may have limited access to the **Mobile Application** and utilize some of the Services provided by Axios Bio Care without creating an account on the **Mobile Application**. Unregistered Users can access some of the information and details available on the Website/Mobile Application. In order to have access to all the features and benefits on our Website/Mobile Application, a User may be required to first create an account on our Website/Mobile Application. As part of the registration process, Axios Bio Care may collect the following categories of personal information from the Users (hereinafter collectively referred to as “User Information”):
  - i. Name;
  - ii. User ID;
  - iii. Email address;
  - iv. Address (including country and ZIP/postal code);
  - v. Gender;
  - vi. Age;
  - vii. Phone number;
  - viii. Password chosen by the User;
  - ix. Valid financial account information; and
  - x. Other details as the User may volunteer.
2. Axios Bio Care may keep records of telephone calls received and made for making inquiries, orders, or other purposes for the purpose of administration of Services.

3. **Internet use:** Axios Bio Care may also receive and/or hold information about the User's browsing history including the URL of the site that the User visited prior to visiting the website/Mobile Application as well as the Internet Protocol (IP) address of each User's computer (or the proxy server a User used to access the World Wide Web), User's computer operating system and type of web browser the User is using as well as the name of User's ISP. The Website/Mobile Application uses temporary cookies to store certain data (that is not sensitive personal data or information) that is used by Axios Bio Care and its service providers for the technical administration of the Website/Mobile Application, research and development, and for User administration.
4. The Mobile Application may enable User to communicate with other Users or to post information to be accessed by others, whereupon other Users may collect such data. Axios Bio Care hereby expressly disclaims any liability for any misuse of such information that is made available by visitors in such a manner.
5. Axios Bio Care does not knowingly collect personal data from children.
6. Axios Bio Care may in future include other optional requests for information from the User including through User Surveys in order to help Axios Bio Care customize the Website/Mobile Application to deliver personalized information to the User and for other purposes are mentioned herein. Such information may also be collected in the course of contests conducted by Axios Bio Care. Any such additional personal information will also be processed in accordance with this Privacy Policy.

**4. Purposes for which your information may be used by Axios Bio Care:**

1. The information which Axios Bio Care collects from you may be utilized for various business and/or regulatory purposes including for the following purposes:
  - i. Registration of the User on the Mobile Application;
  - ii. Processing the User's orders / requests and provision of Services;
  - iii. Complete transactions with Users effectively and billing for the products/ Services provided;

- iv. Technical administration and customization of Website/Mobile Application;
- v. Delivery of personalized information and target advertisements to the User;
- vi. Improvement of Services and features on the Website/Mobile Application;
- vii. Research and development and for User administration (including conducting User surveys)
- viii. Non-personally identifiable information, exclusively owned by Axios Bio Care may be used in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, and 1 mg may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates.
- ix. Dealing with requests, enquiries or complaints and other customer care related activities; and all other general administrative and business purposes.
- x. In case of any contests conducted by Axios Bio Care in which the User participates, the User Information may be used for prize fulfillment and other aspects of any contest or similar offering.

**5. Disclosure and transfer of your personal information:**

1. Axios Bio Care may need to disclose/ transfer your personal information to the following third parties for the purposes mentioned in this Privacy Policy and the Terms of Use:
  - i. To Sellers and other service providers appointed by Axios Bio Care for the purpose of carrying out services on Axios Bio Care's behalf under contract. Generally these contractors do not have any independent right to share this information, however certain contractors who provide services on the Website/Mobile Application, including the providers of online communications services, will have rights to use and disclose the personal information collected in connection with the provision of these services in accordance with their own privacy policies.

- ii. To our affiliates in India or in other countries who may use and disclose your information for the same purposes as us.
  - iii. To government institutions/ authorities to the extent required a) under the laws, rules, and regulations and or under orders of any relevant judicial or quasi-judicial authority; b) to protect and defend the rights or property of Axios Bio Care; c) to fight fraud and credit risk; d) to enforce Axios Bio Care's Terms of Use (to which this Privacy Policy is also a part) ; or e) when Axios Bio Care, in its sole discretion, deems it necessary in order to protect its rights or the rights of others.
  - iv. If otherwise required by an order under any law for the time being in force including in response to enquiries by Government agencies for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences.
  - v. In case of contests conducted by Axios Bio Care in which the User participates, the concerned User's information may be disclosed to third parties, also be disclosed to third parties to the extent necessary for prize fulfillment and other aspects of such contest or similar offering.
2. Axios Bio Care makes all User Information accessible to its employees and data processors only on a need-to-know basis. All Axios Bio Care employees and data processors, who have access to, and are associated with the processing of User Information, are obliged to respect its confidentiality.
3. Non-personally identifiable information may be disclosed to third party ad servers, ad agencies, technology vendors and research firms to serve advertisements to the Users. Axios Bio Care may also share its aggregate findings (not specific information) based on information relating to the User's internet use to prospective, investors, strategic partners, sponsors and others in order to help growth of Axios Bio Care's business.
4. Axios Bio Care may also disclose or transfer the User Information, to another third party as part of reorganization or a sale of the assets of a

Axios Bio Care corporation division or company. Any third party to which Axios Bio Care transfers or sells its assets will have the right to continue to use the personal data and/ or other information that a User provide to us.

#### **6. Retention of the information:**

1. All the information collected/ stored under this Privacy Policy and Terms of Use is maintained by Axios Bio Care in electronic form on its equipment, and on the equipment of its employees. User Information may also be converted to physical form from time to time. Regardless of the manner of storage, Axios Bio Care will keep all User Information confidential and will use/ disclose it only the manner specified under the Privacy Policy and Terms of Use.
2. Part of the functionality of the Website/ Mobile Application is assisting the Sellers to maintain and organize such information to effect sale and purchase of products. Axios Bio Care may, therefore, retain and submit all such records to the appropriate authorities, or to Sellers who request access to such information.
3. The Website/ Mobile Application is also designed for assisting the Users to access information relating to pharmaceutical products. Axios Bio Care may, therefore, retain and submit all such records to the relevant Users.
4. Axios Bio Care will also ensure that User Information is not kept for a period longer than as required for the purposes for which it is collected or as required under any applicable law.

#### **7. Links to third-party advertisements:**

1. The links to third-party advertisements, third party websites or any third party electronic communication services (referred to as "Third Party Links") may be provided on the Website/ Mobile Application which are operated by third parties and are not controlled by, or affiliated to, or associated with Axios Bio Care unless expressly specified on the Website/Mobile Application.
2. If you link to any such Third Party Links, we request you review the website's privacy policy. We are not responsible for the policies or practices of Third Party Links.

## **8. Security Practices and Procedures:**

1. Axios Bio Care adopts reasonable security practices and procedures to include, technical, operational, managerial and physical security control measures in order to protect the personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.
2. Axios Bio Care makes all User Information accessible to its employees only on a need-to-know basis, and binds all such employees to strict confidentiality obligations.
3. Axios Bio Care takes adequate steps to ensure that third parties to whom the Users' Sensitive Personal Data or Information may be transferred adopt reasonable level of security practices and procedures to ensure security of Personal Information.

## **9. Users' rights in relation to their personal information collected by Axios Bio Care:**

1. All the information provided to Axios Bio Care by a User, including Sensitive Personal Information, is voluntary. User has the right to withdraw his/ her/ its consent at any time, in accordance with the terms of this Privacy Policy and the Terms of Use, but please note that withdrawal of consent will not be retroactive.
2. Users can access, modify, correct and delete the personal information provided by them which has been voluntary given by the User and collected by Axios Bio Care in accordance with this Privacy Policy and Terms of Use. However, if the User updates his/ her information, Axios Bio Care may keep a copy of the information which User originally provided to Axios Bio Care in its archives for uses documented herein. In case the User seeks to update or correct, his/ her personal information, the User may exercise these rights by emailing Axios Bio Care at [axiosbiocare@yahoo.com](mailto:axiosbiocare@yahoo.com) communicate the change(s) for updating Axios Bio Care's records.
3. If you, as a casual visitor, has inadvertently browsed any other pages of this Website/ Mobile Application prior to reading the Privacy Policy and the



Terms of Use, and you do not agree with the manner in which such information is obtained, stored or used, merely quitting this browser application should ordinarily clear all temporary cookies installed by Axios Bio Care. All visitors, however, encouraged to use the "clear cookies" functionality of their browsers to ensure such clearing/ deletion, as Axios Bio Care cannot guarantee, predict or provide for the behavior of the equipment of all the visitors of the Website/Mobile Application.

4. If you have inadvertently submitted any personal information to Axios Bio Care prior to reading the Privacy Policy and Terms of Use, and you do not agree with the manner in which such information is collected, stored or used, then you can ask Axios Bio Care, by sending an email to [axiosbiocare@yahoo.com](mailto:axiosbiocare@yahoo.com) containing the rectification required, whether Axios Bio Care is keeping personal data about him/ her, and every User is also entitled to require Axios Bio Care to delete and destroy all such information relating to him/ her (but not other Users) in its possession.
5. In case the User does not provide his/ her information or consent for usage of personal information or subsequently withdraws his/ her consent for usage of the personal information so collected, Axios Bio Care reserves the right to discontinue the services for which the said information was sought.

#### **10. Additional notes to the User:**

1. Axios Bio Care does not exercise control over the sites displayed as search results or links from within its Services. These other sites may place their own cookies or other files on the Users' computer, collect data or solicit personal information from the Users, for which Axios Bio Care is not responsible or liable. Accordingly, Axios Bio Care does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor does Axios Bio Care guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such websites. Axios Bio Care encourages the User to read the privacy policies of that website/Mobile Application.

2. Axios Bio Care shall not be responsible in any manner for the authenticity of the personal information or sensitive personal data or information supplied by the User to Axios Bio Care or any Seller. If a User provides any information that is untrue, inaccurate, not current or incomplete (or becomes untrue, inaccurate, not current or incomplete), or Axios Bio Care has reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete, Axios Bio Care has the right to suspend or terminate such account at its sole discretion.
  3. Axios Bio Care shall not be responsible for any breach of security or for any actions of any third parties that receive Users' personal data or events that are beyond the reasonable control of Axios Bio Care including, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.
  4. The User is responsible for maintaining the confidentiality of the User's account access information and password. The User shall be responsible for all uses of the User's account and password, whether or not authorized by the User. The User shall immediately notify Axios Bio Care of any actual or suspected unauthorized use of the User's account or password.
- 11.** Axios Bio Care will communicate with the Users through email and notices posted on the Website/ Mobile Application or through other means available through the service, including text and other forms of messaging.

**12. Changes in the Privacy Policy:**

1. Axios Bio Care may update this privacy policy at any time, with or without advance notice. In the event there are significant changes in the way Axios Bio Care treats User's personal information, Axios Bio Care will display a notice on the Website/ Mobile Application or send Users an email. If a User uses the Service after notice of changes have been sent to such User or published on the Website/ Mobile Application, such User hereby provides his/ her/ its consent to the changed practices.

**13. Contact information:**

1. Axios Bio Care addresses any discrepancies and grievances of all Users with respect to processing of information in a time bound manner. For this purpose, Axios Bio Care has designated Mr. Riyazkhan Pathan as the Grievance Officer, who will redress the grievances of the Users expeditiously but within one month from the date of receipt of grievance, and who can be reached by:
  - i. Sending a letter marked to the attention of Grievance Officer, Axios Bio Care : U 103, Taybaah Residency, B/h Emaad Tower, 100ft Road, Opp Amber Tower, Sarkhej Juhapura Road