

# Privacy Policy

## Shaadi Genie's Privacy Notice

At Shaadi Genie, we respect your privacy and are committed to protecting your personal data. Your privacy is important to the us. Our goal is to provide you with a personalised online experience that provides you with the information, resources, and services that are most relevant and helpful to you. This privacy policy has been written to describe the conditions under which our website and mobile application is being made available to you. The privacy policy discusses, among other things, how data obtained during your visit to our website and mobile application may be collected and used. We strongly recommend that you read the privacy policy carefully. By using our website and mobile application, you agree to be bound by the terms of this privacy policy. If you do not accept the terms of the privacy policy, you are directed to discontinue accessing or otherwise using the website, mobile application or any materials obtained from it. If you are dissatisfied with the website and (or) mobile application, by all means contact us; otherwise, your only recourse is to disconnect and refrain from visiting (using) the site and mobile application in the future.

The process of maintaining a website and a mobile application is an evolving one, and the operators may decide at some point in the future, without advance notice, to modify the terms of this privacy policy. Your use of the website and mobile application, or materials obtained from it, indicates your assent to the privacy policy at the time of such use. The effective privacy policy will be posted on the website and mobile application, and you should check upon every visit for any changes.

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how Kastranda Technology Limited or Shaadi Genie collects and processes your personal data through your use of the Shaadi Genie website and app or otherwise when you communicate or interact with us.

Our website and app is not intended for children and we do not knowingly collect data relating to children.

### Controller

Kastranda Technology Limited is the data controller of your personal data. We are responsible for its security and for ensuring that we use it only for the purposes outlined in this Privacy Notice.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

### Contact Details

If you need to get hold of us for any reason in connection with your personal data, please email us at [policies@shaadigenie.com](mailto:policies@shaadigenie.com)

We are: Kastranda Technology Limited, Kemp House, 152-160 City Road, London, EC1V 2NX.

We are registered with Companies House, company number 11768888.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns about data protection before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 16 February 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

### **For Shaadi Genie Clients:**

**Identity Data** includes name and email.

**Profile Data** includes email and password.

**Wedding Data** includes wedding date.

**Correspondence Data** includes email correspondence, and Identity Data.

**Usage Data** includes information about how you use our website and app.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Marketing Data** includes your preferences in receiving marketing from us.

**Sensitive Data** includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, information about health and genetic and biometric data. We only

collect this information if you choose to give it to us to take into account different guests particular needs.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

**For Shaadi Genie Suppliers:**

**Contact Data** includes supplier name, business contact, business website, business email, business phone, business address.

**Profile Data** includes your email and password.

**Usage Data** includes information about how you use our website and app.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Marketing Data** includes your preferences in receiving marketing from us.

**Correspondence Data** includes email correspondence and Contact Data.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

**Direct interactions.** We collect the majority of your data when you choose to give this to us on our app or on our website, by email or otherwise. The data that you choose to provide to us helps you to organise your wedding if you are a client or helps clients to understand your services if you are a supplier.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website or app may become inaccessible or not function properly.

**Third parties or publicly available sources.**

We may receive:

Technical Data about you from various third parties and as set out below:

- (a) analytics providers such as Google with servers based outside the EU;
- (b) search information providers such as Google based outside the EU.
- (c) contact data from publicly available sources if you are a supplier.

## **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To provide the services to you in accordance with our website terms and conditions;  
or
- Where it is necessary for our legitimate interests (or those of a third party) and we have made an assessment that your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

In respect of your sensitive data, we will only collect this from you where you provide this information voluntarily because you think that it helps you to organise and arrange your wedding more thoroughly. Where you do so, we will take this as a clear affirmative action signifying your agreement to the processing of your sensitive data. You may withdraw our right to process your sensitive data on your behalf at any time.

Where you provide us with personal data belonging to another person (including any Sensitive Data such as health needs), we do not control that personal data and will act only as processor of that personal data.

### **Emails**

We may use your Identity, Profile or Contact Data to send you reminder emails as part of our service to help with the administration of your account or to assist with managing your wedding.

If you are a user, you may also receive marketing communications from us if you have created an account with us.

## **5. Disclosures of your personal data**

We may need to share your personal data with the parties set out below for the purposes set out in paragraph 4 above:

- Service providers acting as processors who provide IT support, IT backup, data storage, email management and system administration services;

- Analytics and advertising service providers – for the purpose of analysing user behaviour & retargeting;
- Authorities in the cases specified in legal acts;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. Connection to the website**

Each time you visit the website, servers of the website temporarily store information about the connecting device in the login file. In this procedure, regardless your actions, the following data is automatically collected and stored for as long as it is automatically and (or) manually deleted, i.e. the IP address of connecting device, date and time of connection, information about browser you are using and its version, type of the device, and other technical details. This information is collected and processed in order visitors could use our website, also to guarantee the continued security and stability of the system, technical administration of the network infrastructure, as well as for optimisation of service provision and for the internal statistical purposes. In addition, the IP address may be investigated and used in case of violations of the Privacy Policy, attacks against the website's infrastructure and in other cases, if this is provided in this Privacy Policy or applicable legal acts.

## **7. Queries**

Please note that, when administrating your enquiry for wedding services, and submitting answers to you, we may need to contact you by e-mail and (or) by phone. Therefore, if your contact details changes, please inform us immediately, so that we can ensure the smooth communication.

In order to ensure implementation of purposes of processing of personal data that are specified in this section of the privacy policy, your personal data shall be kept for no more than 1 (one) year after submission of request, enquiry, unless Shaadi Genie is required by the legal acts otherwise.

## **8. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third

parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We use reasonable technical and organisational measures in order to secure the information (including personal data) that we have, from the unauthorised access, loss, theft or any unauthorised use, disclosure or modification. For example, all personal data are protected by password access. We do not request or keep financial information such as your bank account details. All personnel and subcontractors are required to sign a confidentiality agreement, if full confidentiality is not part of the main agreement between the parties.

We want to draw your attention to the fact that, despite the fact that we use reasonable measures to protect your personal data, Shaadi Genie may not fully guarantee the security of your information, because it is provided or collected online.

Please note that if you connect to the website from, for example, a shared computer, certain information about you may also be visible to other people, including those, who will use the computer after you.

You may reduce the risk of the unauthorised access to personal data, if you act with the caution and choose the smart means of the protection, such as latest anti-virus software, etc.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. How long will we use your personal data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **10. Cookies Policy**

On the website, we use cookies (small files stored on your computer's or another device's hard drive) for the website's traffic statistic purposes.

When you visit the website for the first time, it displays a pop-up notification informing about use of cookies on the website with link to this privacy policy. While clicking on the "I Accept" button (or equivalent button that expresses your will) or while using the website without

making any choice in the said website's notification, you confirm that you allow Shaadi Genie to save Cookies on your back device (computer, tablet, smartphone, etc.). You can always withdraw your consent and refuse our cookies.

Cookies on our website are as follows:

"Session cookies" that are used only while you are browsing the internet and are automatically deleted after closing the browser;

"Persistent cookies", i.e. such as those that stored on your back device (computer, tablet, smartphone, etc.) until cookie's validation's time end or you refuse the use of cookies using one of the methods described in this privacy policy;

"Third party cookies", i.e. those that are used by third parties, who are not the website's controller;

"Flash cookies", i.e. those that are independent from the web browser. They are designed to be permanently stored on a user's computer. These types of cookies remain on a user's device even after all cookies have been deleted from their web browser;

"Analytical cookies" allow us to recognise and to count the number of visitors to our website, to see how visitors move around the website when they are using it and to record which content viewers view and are interested in.

You can always refuse our cookies, if your browser allows you to do so, however, such a waiver may affect your use of the website or block the access to the website. You can disable cookies in two ways:

- in your browser you can preview the already installed cookies on your computer or other device and delete them one by one or all at once. The steps you need to perform are different so the specific actions to be performed should be set according to the browser you are using;
- you can also set your internet's browser to block cookies or receive a warning about installing any cookie. The steps you need to perform are different in each browser, so the specific actions you want to perform should be set according to the browser you are using

Please note that cookies may also be used by Shaadi Genie's partners or other third parties that are not controlled by the website's controller. Shaadi Genie may not be and is not responsible for the actions of such persons. By suspecting that, without your consent, Shaadi Genie's partners or other third parties, who are not controlled by the website's controller, use cookies, you should contact the specific partner or other third party.

## **11. Third Persons**

Shaadi Genie does not control privacy policies and (or) other rules that are applied to you by the third parties. Therefore, you, at your own discretion and risk, are liable and obligated to comply with them in those cases, when it is applied to you. Shaadi Genie is not liable for other websites' privacy policies or any other content, when reference to the other websites are given on the website, or the reference to the website is given on other websites. Those

websites may have their own privacy policies, with which you are recommended to get acquainted.

Shaadi Genie does not collect any information about you from third parties, except the cases specified in the privacy policy, also when the legal acts' requirements or third parties rights' are infringed.

## **12. Your Legal Rights**

**You have the right in certain circumstances to:**

- right to revoke the given consent
- request access to your personal data
- request correction of the personal data we hold about you
- request erasure of your personal data
- request restriction of processing of your data

Also, you have a right to submit a claim to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)), if you think that the processing of personal data that is related to you is performed in breach of the legal acts. However, you always have a right to contact us firstly using the contacts indicated in section 1 of this privacy policy, if you have additional questions or you want to implement your rights related to the processing of the personal data, mentioned above.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **13. General**

The Website is hosted in the United Kingdom. The operators make no claims that the content on the website is appropriate or may be downloaded outside of the United Kingdom.

Access to the content may not be legal by certain persons or in certain countries. If you access the website from outside the United Kingdom, you do so at your own risk and are responsible for compliance with the laws of your jurisdiction.

A party may give notice to the other party only in writing at that party's principal place of business, attention of that party's principal legal officer, or at such other address or by such other method as the party shall specify in writing. Notice shall be deemed given upon personal delivery, or, if sent by certified mail with postage prepaid, 5 business days after the date of mailing, or, if sent by international overnight courier with postage prepaid, 7 business days after the date of mailing.

If any provision herein is held to be unenforceable, the remaining provisions will continue in full force without being affected in any way. Further, the parties agree to replace such unenforceable provision with an enforceable provision that most closely approximates the intent and economic effect of the unenforceable provision.

Section headings are for reference purposes only and do not define, limit, construe or describe the scope or extent of such section.

This privacy policy shall be governed by, and construed in accordance with, the laws of England, without regard to its conflict of law rules.

Any cause of action you may have with respect to your use of the website or app must be commenced within one (1) year after the claim or cause of action arises.

We shall not be liable for failure to perform or delay in performing any obligation under this privacy policy, if the failure or delay is caused by any circumstances beyond its reasonable control, including, without limitation, acts of God, war, hostilities, invasion, act of foreign enemies, terrorism or civil disorder, storm, earthquake or any other natural disaster of overwhelming proportions ("Force Majeure").