

PRIVACY POLICY

SPORTS FLASHES

This document is an electronic record in terms of (i) Information Technology Act, 2000; (ii) the rules framed there under as applicable; and (iii) the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures.

This Privacy Policy ("**Privacy Policy**") is published in accordance with: (i) Section 43A of the Information Technology Act, 2000 and (ii) Regulation 4 of the Information Technology (Reasonable security practices and procedures and sensitive personal information) Rules, 2011 ("SPI Rules").

Please read this Privacy Policy carefully to understand how **India Sports Flashes Pvt. Ltd.** its subsidiary and affiliate corporations, successors, and assigns (collectively referred to as "**Sports Flashes**") uses and protects the information you provide. This privacy policy (the "**Privacy Policy**") applies to the services provided by Sports FLASHES on its website and/or mobile application, collectively known as "**Platform**" This Privacy Policy applies to all Users ("**Users**") of the Sports FLASHES Platform.

This Privacy Policy covers: (i) the type of information collected from the Users of the Platform including sensitive personal data or information; (ii) the purpose, means and modes of usage of such information; and (iii) how and to whom such information which has been collected will be disclosed

“Personal information” is defined under the SPI Rules to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such a natural person.

The SPI Rules further define **“sensitive personal data or information”** of a person to mean personal information about that person relating to:

- a) financial information such as bank accounts, credit and debit card details or other payment instrument details;
- b) physical, physiological and mental health condition;
- c) sexual orientation;
- d) medical records and history;
- e) biometric information;
- f) information received by body corporate under lawful contract or otherwise;
- g) visitor details as provided at the time of registration or thereafter; and
- h) call data records.

1. WHAT INFORMATION SPORTS FLASHES COLLECTS FROM YOU

Sports FLASHES may collect two (2) types of information about you: Personal and Non-Personal.

1.1. Personal Information

Personal Information refers to information that lets Sports FLASHES know the specifics of who you are and which may be used to identify, contact or locate you (e.g. name, age, gender, mailing address, telephone number and e-mail address). Sports FLASHES may collect Personal Information when you use the Sports FLASHES Platform including, without limitation, setting up account

information, filling out surveys, corresponding with Sports FLASHES, or otherwise volunteering information about yourself.

1.2. Non-personal Information

Non-Personal Information refers to information that, by itself, does not identify you as a specific individual (e.g. demographic information or website visitations). Sports FLASHES may collect Non-Personal Information through any of the methods discussed above as well as automatically through use of industry standard technologies described further below.

2. HOW SPORTS FLASHES COLLECTS YOUR INFORMATION

The Personal Information practices set forth apply to all Sports FLASHES's customers worldwide.

2.1. Registration

Prior to using one or more of the Sports FLASHES Platform, Sports FLASHES may require certain Personal Information and Non-Personal Information to create an individual account ("**Account**") or to enable features or functionality of the Sports FLASHES Platform. Failure to provide all required information required by Sports FLASHES may prevent access to any or all Sports FLASHES Platform, and failure to maintain accurate information may result in suspension or termination of access to any or all Sports FLASHES Platform.

2.2. Information Collected Through Technology

While you are able to visit the Sports FLASHES Platform and remain anonymous, Sports FLASHES or its third party service providers may still collect Non-Personal Information about your use of the Sports FLASHES Platform (e.g. your Internet browser, operating system, IP address,

connection speed, and the domain name of your Internet service provider). Such information may be gathered by the following methods:

a) **Cookies:** Cookies, including local shared objects, are small pieces of information that are stored by your browser on your computer's hard drive which work by assigning to your system a unique number that has no meaning outside of the Sports FLASHES Platform. Cookies do not generally contain any Personal Information. Most web browsers automatically accept cookies, but you can usually configure your browser to prevent this. Not accepting cookies may make certain features of the Sports FLASHES Platform unavailable to you.

b) **IP Address:** You may visit many areas of the Sports FLASHES Platform anonymously without the need to become a registered User. Even in such cases, Sports FLASHES may collect IP addresses automatically. An IP address is a number that is automatically assigned to your computer whenever you begin Services with an Internet services provider. Each time you access the Sports FLASHES Site and each time you request one of Sports FLASHES's pages, the server logs your IP address.

c) **Web Beacons.** Web beacons are small pieces of data that are embedded in web pages and e-mails. Sports FLASHES may use these technical methods in HTML e-mails that Sports FLASHES sends to Users to determine whether they have opened those e-mails and/or clicked on links in those e-mails. The information from use of these technical methods may be collected in a form that is Personal Information.

3. HOW SPORTS FLASHES USES YOUR INFORMATION

Sports FLASHES uses the information that you provide or that we collect to operate, maintain, enhance, and provide all of the features and services found on the Sports FLASHES Platform as well as to track user-generated content and Users to the extent necessary to comply as a service provider.

Sports FLASHES may share your registration data, usage data and any other data related to your use of the Sports FLASHES site with third parties to the extent set forth in our Terms of Use as updated regularly. We otherwise use all reasonable efforts to protect your information. Additionally, in the event that all resources of the Sports FLASHES, that is to say, the Sports FLASHES Platform, are acquired by another company the personal data required in order to continue to operate Sports FLASHES are acquired by the buyer.

3.1. System Administration

Sports FLASHES may use Non-Personal Information for the purposes of system administration, assisting in diagnosing problems with Sports FLASHES servers, monitoring Sports FLASHES's system performance and traffic on the Sports FLASHES Platform and to gather broad demographic information about Sports FLASHES customers.

3.2 Personalization

Sports FLASHES uses Cookies and IP Addresses to track features such as delivering Content specific to your interests and informing you of new, relevant services or certain third party offerings.

3.3 Notices to Registered Users

If you have registered for an Account, Sports FLASHES may use your Personal Information to send e-mails regarding your registration, including

confirmation to verify the accuracy of any information you have provided, and instructions on how to post Content. Sports FLASHES may also send you e-mails to verify your identity or to notify you if Sports FLASHES believes your use of Sports FLASHES Platform violates any applicable agreement for the use of the Sports FLASHES Platform.

3.4 Promotional E-mails

Sports FLASHES may use your Personal Information to send you e-mails periodically listing promotions or events relating to the Sports FLASHES Platform or from Sports FLASHES' marketing partners or sponsors. You have the choice to opt-out of receiving such promotional e-mails by sending an e-mail to [*] and/or following the instructions in such correspondence. Once Sports FLASHES's has processed your opt-out request, Sports FLASHES will not send you promotional e-mails unless you opt back in to receiving such communications.

3.5 Contact Information

If you contact Sports FLASHES by telephone, e-mail or letter, Sports FLASHES may keep a record of your contact information and correspondence. If you report a problem with the Sports FLASHES Platform, Sports FLASHES may collect this information in a file specific to you. You may contact Sports FLASHES at [*] to request the removal of this information from Sports FLASHES's database.

4. HOW TO ACCESS AND CHANGE YOUR PERSONAL INFORMATION

Upon request, Sports FLASHES shall allow Users to update or correct Personal Information previously submitted, but only to the extent such activities will not compromise privacy or security interests. Additionally, upon request,

Sports FLASHES shall delete Personal Information from the database where such information is stored; however, it may be impossible to entirely delete a User's entry without some residual information being retained due to the manner in which data backups are maintained. Requests to delete Personal Information shall be submitted to [*].

To protect your privacy and security, we take reasonable steps to verify your identity before granting you account access or making corrections to your information. **You are responsible for maintaining the secrecy of your unique password and account information at all times.**

5. DISCLOSURE OF INFORMATION TO THIRD PARTIES

Sports FLASHES does not sell, trade or rent Personal Information collected through the Sports FLASHES Platform to any third party. Notwithstanding the foregoing, Sports FLASHES shall: (1) fully cooperate with law enforcement agencies; and (2) may be required to disclose Personal Information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation.

6. SAFEGUARDING YOUR PERSONAL INFORMATION

6.1 Security Measures

Sports FLASHES takes appropriate security measures to protect against unauthorized access, alteration, disclosure or destruction of Personal Information. These include, but are not limited to, internal reviews of: (a) Sports FLASHES's data collection; (b) storage and processing practices; (c) electronic security measures; and (d) physical security measures to guard against unauthorized access to systems where Sports FLASHES stores Personal Information. All Sports FLASHES employees, contractors and agents who access Personal Information are bound by confidentiality obligations and

may be subject to discipline, including termination and criminal prosecution or unauthorized use or disclosure of Personal Information.

6.2 Third Party Links

The Sports FLASHES Platform may contain links to third parties who may collect Personal Information and Non-Personal Information directly from you. Additionally, Sports FLASHES may use third parties to provide components of the Sports FLASHES Platform. In either case, such third parties may have separate privacy policies and data collection practices, independent of Sports FLASHES. Sports FLASHES: (a) has no responsibility or liability for these independent policies or actions; (b) is not responsible for the privacy practices or the content of such websites; and (c) does not make any warranties or representations about the contents, products or services offered on such websites or the security of any information you provide to them.

7. CHANGES TO SPORTS FLASHES'S PRIVACY POLICY

Sports FLASHES continually strives to implement new technologies and processes to better protect you, your privacy and your use of the Sports FLASHES Platform. As a result, changes to this Privacy Policy may be made by Sports FLASHES from time to time. In no event will these changes result in the degradation of any of the security measures designed to protect you from unauthorized disclosure, as such measures are described in this Privacy Policy.

8. CHILDREN UNDER 18 YEARS OF AGE

Use of the Sports FLASHES Platform is not intended for minors under the age of 18 ("Minors"). Minors are not authorized by Sports FLASHES to use the Sports FLASHES Platform, even if Minors set up an Account or accept the

terms of any agreement for Sports FLASHES Platform. Parents or guardians may authorize Minors between the ages of 12 and 17 to use the Sports FLASHES Platform, provided they assume all responsibility and legal liability for the conduct of such Minor including, without limitation, monitoring the Minor's access and use of the Sports FLASHES Platform. Sports FLASHES does not intentionally collect nor maintain any personally identifiable information from Minors. If you discover your Minor child has submitted his/her information to Sports FLASHES, you may request to have such information deleted from Sports FLASHES's database by sending an e-mail request to [*] together with the e-mail address that was submitted by the Minor. Upon receiving the request, Sports FLASHES shall delete such information within [*] business days.

9. CONTACT

If you have any questions about this Privacy Policy please contact Sports FLASHES by sending a letter or e-mail to: [_info@supersports.co.in_____](mailto:info@supersports.co.in).