

We at Pinky Promise Pvt. Ltd. know that You as a User (hereinafter referred to as “You” or “Your” or “User” or “Customer”) care about how Your personal information is used and shared, and We take Your privacy seriously. By visiting or using Our Website (askpinkypromise.com) or domain name, or any other linked pages, features, content, mobile applications, or any other services We offer from time to time, in connection therewith (collectively, the ‘Application’/ ‘App.’), or by using the Services / Products including but not limited to Our Chatbot, Chatrooms, Doctors’ Consultation Booking Service, HPV Vaccine Booking Service, Pathology Tests Booking Service, Purchasing and/or Using Products available for Purchase on Our App., in any manner, You acknowledge that You accept, and are subject to, the practices and policies outlined in this Privacy Policy, operated by Pinky Promise Pvt. Ltd. (hereinafter referred to as “We” or “Our” or “Us” or “Company” or “App.”)

Please read this Policy carefully before registering and every time before You use Our App. or access any material, information, Service or Product. If You do not agree with any of the terms mentioned under this Privacy Policy, You must immediately cease accessing or using Our App., Website, and any of Our Services and Products. Your use of Our Products, Services, or App., shall signify Your acceptance of this Policy and consequently Your agreement to be legally bound by the same.

This page is used to inform Users of Our policies that concern the collection, use, and disclosure of Personal Information of those persons who decide to use Our App., Website, or any of Our Services and Products. If You choose to use Our App., Website, or any of Our Services and Products, then You acknowledge that You accept, and are subject to, the practices and policies outlined in this Privacy Policy and agree to the collection and use of information as outlined in this Privacy Policy. The Personal Information that We collect is used for providing and improving the Products and Services offered by Us. We will not use or share Your information with anyone except as described in this Privacy Policy.

TABLE OF CONTENTS

- 1. What does this Privacy Policy cover?**
- 2. Where do We store Your personal information and data?**
- 3. What information do We collect?**
- 4. Purpose and Use of information.**
- 5. Will We share any of the personal information We receive?**
- 6. Is personal information about me secure?**
- 7. Residents of Nations other than India**
- 8. European Union Residents and General Data Protection Regulation (GDPR)**
- 9. What personal information can I access?**
- 10. What choices do I have?**
- 11. Cookie Policy.**
- 12. Third Party Service Providers**
- 13. Changes to This Privacy Policy**
- 14. Disputes and Arbitration**
- 15. How do We Contact You**
- 16. Contact Us**

1. What does this Privacy Policy cover?

This Privacy Policy deals with Our treatment of personally identifiable information (‘personal information’) that We gather when You are availing, accessing or using Our App. for availing third party Products and Services. This policy does not deal with the policies or practices of companies that We do not own or control, or to individuals that We do not employ. By visiting Our App., downloading the App., purchasing Products via the App., or subscribing for, or availing Our Services, You consent to the collection, use, sharing, disclosure and processing of Your personal information by Pinky Promise Pvt. Ltd. and each of our agents, employees, developers, affiliated business, sellers/service providers, etc., in accordance with the terms of this Privacy Policy or as otherwise required by, or permitted under, applicable law. We do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to register for the Products or Services on Our App., including, but not limited to Our Chatbot and Chatrooms. If You are under 18, please do not attempt to register for the Products or Services on Our App. or send any information about yourself to Us. No one under the age of 18 is permitted to provide any personal information to Us. In the event that We learn that We have collected personal information from a child under age 18 without verification

of parental consent, We will delete that information as quickly as possible. If You believe that We might have any information from or about a child under 18, please contact Us at contact@askpinkypromise.com.

2. Where do We store Your personal information and data?

Your information/data is currently stored and protected in MongoDB and MySQL databases and Amazon Web Services servers. However, We reserve the right to switch databases and/or server providers at any time, or host the same in-house. Your information/data may also be stored and/or accessed on the devices of Our employees, third-party contractors/freelancers, interns, and third-parties, for any reason whatsoever.

3. What information do We collect?

a. Information provided to Us

We receive and store any information You knowingly provide to Us, including:

<i>Information provided by You to Us</i>	<i>Purpose of collecting information</i>
Email ID	To register You as a User of Our App.
Phone number	To register You as a User of Our App.
Date of Birth	To determine age, as many reproductive health conditions are dependent on the age of the User
Height and weight	To calculate BMI (Body Mass Index), in order to make general calculations for information concerning Your health, and in order for doctors to accurately diagnose and if required, subsequently prescribe the correct dosage of medication

Gender	To ensure accuracy of Chatbot result, and in order for doctors to accurately diagnose and prescribe the correct medication
Nickname	To provide a mechanism for the User to protect his/her identity by not revealing his/her real name
Address	For delivering Our Products, efficiently communicating, collecting and delivering Pathology reports, fulfilling Prescriptions, etc.
Last Menstrual Period	To allow the App. to calculate and determine the dates of the next cycle and enable You to track the same, and for doctors to accurately diagnose and if required, subsequently prescribe the correct medication
Duration of Menstrual Bleeding	To allow Us to track Your flow and fertility, and to enable You to track the same, and for doctors to accurately diagnose and if required, subsequently prescribe the correct medication
Valid Government ID (as per telemedicine practice guidelines)	To help with faster and easier registration, and for consultation with doctors

The information collected from You as set-out above constitutes ‘personal information’ or ‘sensitive personal data or information’ (“SPDI Rules”) in terms of the SPDI Rules. You hereby consent to collection of such information.

You can choose not to provide Us with certain information, but then You may not be able to register with Us or to take advantage of some of Our Services / Products.

b. Information collected automatically:

<i>Information collected automatically</i>	<i>Purpose of collecting information</i>
Chatroom logs	To enable Us to regulate the quality of conversations in the Chatroom and learn from these conversations to provide better Services/Products
Chatbot logs	To enable Us to improve the nature of the chatbot services provided to you
Order history	To enable Us to help You in case of any order related queries and to track Our own performance
Order status	To enable You to know the status of Your order of Products with Us and for payment, billing and invoicing
Consultation History	In order to provide You with a efficient and smooth User experience, and in order to tailor Our products and/or services to Your specific needs
IP Address	To improve Our User outreach, especially in lesser served areas
Usage Behaviours - Duration spent by You on Our App., No. of times the App. was visited etc.	To enable Us to improve Our App., Products and services

If You want to withdraw Your consent, such withdrawal of the consent shall be sent in writing, via e-mail Us contact@askpinkypromise.com.

4. Purpose and Use of information

You expressly agree that Your Personal Information as well as Your Sensitive Personal Data or Information such as, but not limited to — (i) financial information such as Bank account or credit card or debit card or other payment instrument details; (ii) physical, physiological and mental health condition; (iii) sexual orientation; and (iv) medical records and history; may be used by Us for the purposes of, but not limited to — research and development; improving and developing software, products, and services; training and developing artificial intelligence bots; targeted notifications and suggestions, concerning products and services; shared with third parties, to be used by them for the purposes of research and development, and/or marketing and advertising.

Additionally We, Our affiliates and/or the sellers or service providers may access and use Your Personal Information as well as Your Sensitive Personal Data or Information for the following purposes:

- Optimizing, or further developing/improving operation of the App. and providing a better User experience;
- To contact You in relation to Products and Service offerings on the App., including pursuant to current or future collaborations with third party service providers;
- To share with the Doctors and other professionals who can be consulted through Our App., in order to provide a more accurate and helpful consultation;
- General business and operating purposes, such as the administration, management and operation of the business, including client/User interaction, responding to requests, customizing and improving Our Services;
- For payment, billing and invoicing related purposes;
- To generate aggregated data and to prepare insights to enable Us to understand patterns and trends with a view to learn more about Your preferences or other characteristics;
- Compliance with Our obligations under applicable laws and other regulations, including to protect against and prevent fraud and other legal or information security risks;
- To support progress in research in line with our entrepreneurial goals, which includes but is not limited to improving healthcare, improving and developing software, products and services, training and developing artificial intelligence bots, etc.;
- For marketing and advertising purposes; and
- To serve any other lawful purposes.

5. Will We share any of the personal information We receive?

We will never share or sell Your personal information in any other way other than in the manners described in this Privacy Policy. You must hence read the entire Privacy Policy carefully, and immediately stop using any of our products and services if You disagree/do not consent to any portion whatsoever of this Privacy Policy.

The doctors who can be consulted through Our App., are bound by Indian law to adhere to the rules and regulations governing the practice of medicine in India, including those concerning patient information, data, confidentiality, etc. For the purposes of efficiency and convenience in Your doctor's consultations, pathology tests bookings, HPV vaccine bookings, and for the purposes of You to have a more efficient and convenient user experience, our employees, agents, interns, etc. may access your personal medical information.

Your Personal Information and Sensitive Personal Data may be shared with persons and legal entities, in the manner described below -

- **Affiliated businesses and third-parties We do not control** - In certain situations, businesses or third parties that We are affiliated with, may sell items or provide services to You through Our App./Website (either alone or jointly with Us). For the same, the said affiliated businesses and third-parties may require Us to provide them with Your personal information and data.
- **Agents** - We employ other companies and people to perform tasks on Our behalf and need to share Your information with them to provide Products and Services to you.
- **User submissions** - Any content or personal information that You voluntarily disclose online in a manner that other Users can view (such as in Chatrooms, Forums, etc.), becomes publicly available, and may be collected and used by any person or legal entity and by us, for any reason and in any manner whatsoever.
- **Protection of Pinky Promise Private Limited and others** - We may release personal information when We believe in good faith that the release of Your personal information is necessary to comply with laws; enforce or apply Our Terms of Service, this Privacy Policy, and other agreements; or protect the rights, property, or safety of Pinky Promise, Our employees, Our Users, or others. This also includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.
- **Offers, programs and benefits** - We may offer certain programs (such as loyalty programs), benefits and offers provided by Our affiliates, partners or third parties, which are complementary to Our products and services, or otherwise. For the same, the said affiliates, partners and third parties, may require Us to provide them with Your personal information and data.

- Research and development - We may use and also share with third parties, Your Personal Information and Sensitive Personal Data to support progress in research in line with our entrepreneurial goals, which includes but is not limited to improving healthcare, improving and developing software, products and services, training and developing artificial intelligence bots, etc.
- Marketing and advertising- We may use and also share Your data with third parties for marketing and advertising purposes.

Your Personal Information and Sensitive Personal Data may be shared with persons and legal entities that are not a part of the list above, and Your Personal Information and Sensitive Personal Data may be shared in any other manner which is not described in the list above.

6. Is personal information about me secure?

Your account is protected by a password for Your privacy and security. You need to prevent unauthorized access to Your account and personal information by selecting and protecting Your password appropriately and limiting access to Your device or computer and browser by logging out after You have finished accessing Your account.

We shall endeavour to put in place measures to ensure that Your information in Our possession or under Our control is destroyed and/or anonymized reasonably after: (a) the purposes for which Your information was collected is no longer being served by the retention of such information, and also (b) retention is not likely to be required for longer necessary under any applicable law, and also (c) retention is not likely to be required for protecting the rights, property, or safety of Pinky Promise, Our employees, Our Users, or others. Your data may be held with Us either directly or in an anonymized, de-identified and/or aggregated form. The data may be held by our affiliates, service providers, sellers, associates, agents, representatives, and other authorized third parties, for as long as they deem necessary, to enable Us to provide Our services effectively, or for any other purpose.

We endeavor to protect the privacy of Your account and other personal information We hold in Our records, but We cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of User information at any time. Our App./Website may contain links to other websites. We are not responsible for the terms of service, privacy policies, and/or practices of other websites. Additionally, when following a link to another website, You should always read that website's terms of service and privacy policy.

Important Note - Since no security system is impenetrable. We cannot guarantee the security of

Our databases and systems, nor can We guarantee that information You supply won't be intercepted while being transmitted to Us over the Internet. Any transmission of information by You to Our App., Website, or otherwise, is at Your own risk.

7. Residents of Nations other than India

Our App. allows You to consult with doctors who are licensed to practice in India. If You choose to book a consultation with a doctor through Our App. while You are residing outside of the nation of India, it is Your sole prerogative and responsibility to check the laws, rules, and regulations, of the jurisdiction applicable to you, with re. to the use of consulting a doctor in India. Pinky Promise makes no representation or suggestion whatsoever that the doctors who can be consulted through the App. have any right, license, or authority, to practice medicine anywhere other than in India. Additionally, the doctors who can be consulted through the App., are bound by Indian law to adhere to the rules and regulations governing the practice of medicine in India, including those concerning patient information, data, confidentiality, etc. which may or may not be in consonance with the rules and regulations governing the practice of medicine in the jurisdiction in which You reside. Some of the relevant rules and regulations governing the practice of medicine in India can be found here -

1. [Indian Medical Council \(Professional conduct, Etiquette and Ethics\) Regulations, 2002](#)
2. [Indian Medical Council Act, 1956](#)
3. [Insurance Regulatory and Development Authority \(Third Party Administrators\) Health Services Regulations, 2016](#)
4. [Telemedicine Practice Guidelines](#)
5. [Indian Council of Medical Research Guidelines](#)
6. [Indian Medical Association Rules](#)

8. European Union Residents and General Data Protection Regulation (GDPR)

Residents of the European Union can exercise their rights under the General Data Protection Regulation (GDPR) by sending an email directly at contact@askpinkypromise.com. The General Data Protection Regulation (GDPR) can be accessed at - [REGULATION \(EU\) 2016/ 679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#)

9. What personal information can I access?

Through Your account settings, You may access, and, in some cases, edit or delete the following information You have provided to Us, such as:

- nickname and password
- address
- user profile information, including Your height, weight, and age
- last menstruation date
- duration of the menstrual cycle
- Order history
- Consultation history and prescriptions (if any) from Consultations booked through Our App., or uploaded by You
- Pathology and Radiology Test Reports for tests booked through Our App., or uploaded by You

The information You can view and update may change as the App. changes. Please note that any information that is automatically uploaded from a Product to the App., or collected otherwise from You by Us (including SPDI), cannot be later changed or updated.

We will address Your grievances and concerns surrounding usage of Services or Products through the App. within specified timelines as per applicable law. If You have any questions about viewing or updating information We have on file about you, or if You wish to raise any complaint/grievances, or object/withdraw Your consents, please contact Us at contact@askpinkypromise.com. Please provide Us with a detailed description of the complaint/grievance, and We will endeavour to resolve Your grievances within 15 (fifteen) days from the date of receipt of such grievance or within such timeframe stipulated under applicable laws.

We reserve the right to delete any of Your personal data and information, at any time, for any reason whatsoever. No intimation will be provided to You before any of Your data, information, files, etc. are deleted by us. And You are hence, advised to not rely on Us for the long term storage or short term storage of any of Your personal data, information, files, etc.

10. What choices do I have?

You can always opt not to disclose information to Us, but keep in mind some information may be needed to register with Us or to take advantage of some of Our Services / Products. If You would like Us to delete/modify Information that You have provided via the App. or otherwise to Us,

please contact Us at contact@askpinkypromise.com and We will respond in a reasonable time. Please note that some or all of the Information provided by You to Us may be required in order for the App. / Products to function properly. Please note that We do not promise to delete any information requested to be deleted by You, unless the law requires Us to do so.

You may be able to add, update, or delete information as explained in the clause above. When You update information, however, We may maintain a copy of the unrevised information in Our records. Please note that some information may remain in Our private records after Your deletion of such information from Your account. If You do not wish to receive email or other mail from Us, please email Us at: contact@askpinkypromise.com. Please note that if You do not want to receive emails and other mails from Us, such as this Privacy Policy and the Terms of Service, those documents will still govern Your use of the App., Website, Products and Services. And in any case, regardless of whether the same is e-mailed to You, You are responsible for reviewing such documents each time before using the App., Website, Products and Services, especially since there may be important updates/changes to the said documents.

If You wish to opt-out of any services, offers, benefits, etc. offered by Us or sellers on the Platform or their group entities or third party business alliance partners, You may do so in accordance with the terms specified to You by such affiliate/group entity. You are requested to carefully track the same, from time to time. To the extent that You do not expressly choose to opt-out of services, they may be provided to You on the basis that You have opted in to them.

11. Cookie Policy

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to Your browser from the websites that You visit and are stored on Your device's internal memory.

Whenever You interact with Our App., We automatically receive and record information on Our server logs from Your browser including Your IP address, 'cookie' information, and the page You requested. 'Cookies' are identifiers We transfer to Your computer or mobile device that allow Us to recognize Your browser or mobile device and tell Us how and when pages in Our App. are visited and by how many people. You may be able to change the preferences on Your browser or mobile device to prevent or limit Your computer or device's acceptance of cookies, but this may prevent You from taking advantage of Our App.'s best features.

Delete targeting cookies

You can delete browser cookies from any browser used by You from the browser settings/tools.

Information stored on cookies

We may choose to store cookie information stored on the App. memory such as (i) User segment hits or information on a specific product, service, brand or model in which the User has shown interest during its visit to a certain website and (ii) time and date stamp of the latest update of the User profile.

If the cookie is deleted by the User, all profile data is removed. For the sake of clarity, no segments relating to information which We consider sensitive have been or will be created, such as segments relating to political opinions, religious beliefs, etc. Further, We are very sensitive to the issue of children's privacy and marketing directed to children. No segments are intended to be established for the profiling of children.

12. Third Party Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate Our Service;
- To provide the Service on Our behalf;
- To perform Service-related services; or
- To assist Us in analyzing how Our Service is used.

The third-party companies such as but not limited to, Metropolis Health Care Ltd. and KRM Healthcare Private Ltd.

require the following information:

- Name
- Salutation
- Age
- Date of Birth
- Valid ID verification
- Address
- Tests
- Other Personal Information, including SPDI

Payments shall be accepted through a third-party provider – Razorpay. While We trust Razorpay, and they provide services to several leading E-commerce platforms, Razorpay is a third party service provider not affiliated with us in any way. Hence You must independently agree to the

Terms of Services and Privacy Policy of Razorpay. The same can be found on RazorPay's website on the following links -

1. [RazorPay Privacy Policy](#)
2. [RazorPay Terms of Service](#)

By agreeing to Our Privacy Policy, You agree to discharge Us and any of Our affiliates, from any liability, or claim, that You may otherwise have been entitled to, for any issues, problems, or losses, if any, caused to You by Razorpay/due to using Razorpay's services. For any queries, complaints or issues, You must contact Razorpay directly at –

- (a) Phone No.: 080-46669555
- (b) Email: grievances@razorpay.com
- (c) Address: Razorpay Software Private Limited, 1st Floor, SJR Cyber, 22, Laskar Hosur Road, Adugodi, Bangalore, Karnataka – 560030.

You agree and understand that Razorpay handles and is responsible for all transactions, and hence, any liability accrued, whether or not indemnified, concerning or arising out of any financial transaction on Our App., will accrue and lie only upon Razorpay, and not on Us.

Our App., Website, Products and Services, and related documents such as this Privacy Policy, may contain links to other websites. If You click on a third-party link, You will be directed to that website. Note that these external websites are not operated by Us. Therefore, We strongly advise You to review the Privacy Policies and Terms of Service of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party websites or services.

13. Changes to This Privacy Policy

We may amend this Privacy Policy from time to time. Use of information We collect now is subject to the Privacy Policy in effect at the time such information is used and/or has remained stored. If We make changes in the way We use personal information, We may notify You by posting an announcement on Our App. or sending You an email or with an App. notification. However, You are advised to review this page periodically for any changes. You are bound by any changes to the Privacy Policy when You use Our App., Product or Service after such changes have been first posted. Your continued use of Our App. or Website or any Products or any Services will amount to Your acceptance of the latest Privacy Policy in effect at that time.

14. Disputes and Arbitration

In case of a dispute on any grounds whatsoever, You agree that the dispute will be settled through arbitration by a sole arbitrator. The Arbitrator shall be selected by Us and the Seat of Arbitration will be Mumbai, subject to the laws and jurisdiction of the city of Mumbai, Maharashtra, India. The Cost of Arbitration shall be borne entirely by You. The “Cost” shall include the fees of the Arbitrator, cost of Arbitration Premises and any other Ancillary costs related to the Arbitration. The Arbitration shall take place at a venue selected by Us, at the Seat of Arbitration, Mumbai.

15. How do We Contact You

E-mail, WhatsApp, Text Message and other modes of communication:

We may contact you, by email or other means; for example, We, or persons We share Your Personal Information with, may send You promotional offers on behalf of other businesses, or communicate with You about Your use of the App. or the Product. Also, We may receive confirmation when You open an email from Us. This confirmation helps Us make emails more interesting and improve Our service. If You do not want to receive email or other mail from Us, please indicate Your preference by emailing Us at contact@askpinkypromise.com.

We may contact You, by WhatsApp Messenger or other means; for example, We, or persons We share Your Personal Information with, may send You promotional offers on behalf of other businesses, or communicate with You about Your use of the App. or the Product. Also, We may be able to view WhatsApp delivery reports, which could indicate when You have opened the WhatsApp message from us. This confirmation helps Us make WhatsApp messages more interesting and improve Our service. If You do not want to receive WhatsApp messages from Us, please indicate Your preference by emailing Us at contact@askpinkypromise.com.

We may contact you, by Text Messages or other means; for example, We, or persons We share Your Personal Information with, may send You promotional offers on behalf of other businesses, or communicate with You about Your use of the App. or the Product. Also, We may be able to view delivery reports, which could indicate whether the message was delivered to You. This confirmation helps Us make Text Messages more interesting and

improve Our service. If You do not want to receive Text Messages from Us, please indicate Your preference by emailing Us at contact@askpinkypromise.com.

16. Contact Us

If You have any questions or suggestions about Our Privacy Policy, do not hesitate to contact Us at contact@askpinkypromise.com.