PRIVACY POLICY

<u>www.manoramanews.com</u> ("Manoramanews") is operated by MM TV Limited, [CIN : U92132KL2004PLC017566] a Company incorporated under the provisions of the Companies Act, 1956 and deemed to exist within the purview of the Companies Act, 2013 and having its registered office at Door No. XII/1359, K. V. M. M. Building, K. K. Road, Kottayam, Kerala – 686 001 and administrative office at Door No.2/275 A, National Highway Bypass Road, Aroor Post, Alappuzha, Kerala – 688 534. This Policy shall be construed as provided in compliance with Information Technology Act, 2000 as amended from time to time and read with the information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

- 1. MM TV Limited ("MMTV" or "we" or "our") wants User ("User" or "You" or "Yourself") to be familiar with how we collect, use and disclose information from and about you. MMTV is committed to protecting the privacy of the users of its website or its related mobile sites and software applications ("Applications") offered by MMTV. The Content or Programmes or Applications offered from time to time by MMTV in connection with its business shall be collectively termed as "Services". The term "Personal Information", Sensitive Information" and "Information" shall have the meaning ascribed to it under the applicable laws in India.
- 2. Personal Information or Sensitive Information or Information of User(s) is collected if the User(s) registers with the Website, accesses the Website or takes any action on the Website or uses or accesses the services as defined in the Terms of Use. The terms of the Policy provided herein govern your use of any and/or all of the Applications and the information accessible on or from these Applications. Unless a different policy is provided on particular Application, in which case such different policy shall control data collected through that particular Application. This Privacy Policy must be read in conjunction with the Terms of Use and other Policies available on our Application. Your use of the services offered on the Application is construed to mean that you consent to our collection, storage, Processing and transfer of your Personal Information or Sensitive Information in accordance with this Privacy Policy and you consent to the terms and conditions of this privacy Policy.
- 3. MMTV reserves the right, at its discretions, to change, modify, add or remove portions of this Policy at any time. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Application. We recommend that you review this Policy periodically to ensure that you are aware of the current privacy practices.
- 4. Use of Manoramanews is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872. As set forth in our Terms of Use, Services are for a general audience; are not targeted to persons under the age of 18 years. We don't knowingly collect personal information from person less than 18 years of age. If we become aware that persons less than 18 years of age have provided us with information for creating customer id, we take steps to remove such information and terminate such accounts.
- 5. The Privacy Policy applies for all users, including both those who use the Services without being registered with (or subscribing) to Services ("Guest" or "Visitors") and those who have registered with or subscribed to Service ("Members"). You hereby consent to our collection, use, sharing and disclosure of your information as described in this Privacy Policy. If you do not agree with this Privacy Policy at any time, in part or as a whole, do not use Manoramanews or services provided on Manoramanews or provide us with any of your information.
- 6. Collection and use of Personal Information

We Collect the information directly provided by you, capture details based on your usage, also collect data through cookies (A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. Cookies are useful for enabling the browser to remember information specific to a given user) or similar technologies and log data. The information's collected could be following :

- a) Upon downloading the app in your handheld device we capture your International Mobile Equipment Identity Number or IMEI Number.
- b) If you opt to be a registered User, you have to provide your email id or mobile number. Also you have to key in a unique password set by you.
- c) While creating a user id if you wish you can provide your first name, last name and upload your profile picture.

- d) To serve you better and provide excellent viewer experience we collect information's regarding usage behavior, other traceable activities online, content or advertisement viewed, etc using the Application.
- e) We capture details of the Computer System or computer network which You use to visit the website and undertake any activity on the website, such as a unique device identifier including user behavior from web based cookies, session identifiers from device id, commercially available services, data aggregators platforms.
- f) We also capture details of IP address, operating system, network, location, Browser type, Browser version, Browser configuration, name of internet service provider and other types of computer and connection related information relevant to identifying your type of device, connecting to the website, enabling data exchange with you and your device and ensuring a convenient use of the website. The Uniform Resource Locator (URL) and IP address of the website from which you accessed or were directed to our website including date and time.
- g) Sub pages visited while on our website, links followed on the website, including date and time.
- h) We also capture your interaction with our Application to the details that we can help you continue watching the same content across devices. Hence will capture the points in the video till when you watched, skipped, etc.
- i) Service request placed.
- j) Transaction history, including open and completed transactions
- k) Search terms entered.
- I) Content / Services / products viewed or searched for on the website.
- m) Newsletter subscription, enrollment for promotions, use of Special offers, etc.
- n) Consents, authorizations, etc. granted.
- o) Survey answers, reviews, ratings and other types of feedback provided.
- p) Content of any communications sent through the website, including any information posted in social communities on the Website or otherwise shared with platform and / or other users, as well as chat messages and chat transcripts.
- 7. Third Party Websites, Applications and services.
 - i. User understand and agree that MMTV may allow third parties to put up advertisements on the Application, and MMTV does not control the contents of such third party advertisement on the Application. The Application may include hyperlinks to various external websites/applications or platforms. Such third party websites / applications are governed by their respective privacy policies, which are beyond our control. MMTV does not in any manner whatsoever authenticate, endorse, verify or certify these third party websites or any of their contents or services. Please note that you are clicking the link to the third party websites / applications at your sole risk and responsibility.
 - ii. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the third party website / application you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these websites / applications via a link from the website's homepage, you should contact the website / application directly for more information's. If you opt to visit / use those links the said websites or platforms may require you to disclose your information's. You acknowledge and agree that we are not responsible for any collection or disclosure of your information's by any external sites, applications, companies or persons thereof.
 - iii. You further acknowledge and agree that we are not liable for any loss or damage which may be incurred by you as a result of the collection and / or disclosure of your information via third party links, as a result of any reliance placed by you on the completeness, accuracy or existence of any advertising, product services or other materials on or available via such third party links. This will include all transactions and information transmitted therein, between you and any such third party sites or applications or resources, such transactions are strictly bi-partite. We shall not be liable for any disputes arising from or in connection with such transactions between you and the aforementioned third parties.
- 8. Data Protection

- a) MMTV uses reasonable security measures, at the minimum those mandated under the Information Technology Act, 2000 as amended and read with information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011. We aim to protect your personal information or information employing commercially reasonable or practicable security practices and procedures and security methods and technologies. We have implemented appropriate internal control measures designed to protect the security of any personal information we process. We will also ensure on reasonable commercial efforts basis that any agent or third party that we employ complies with the same security standards as we do for the protection of your Personal Information.
- b) However, please also remember that we cannot guarantee that the internet itself is 100% secure. Once your information is in our possession, we have commercially reasonable procedure and security practices in places to reasonably endeavor to prevent unauthorized access. You accept the inherent security implications of providing information over internet and will not hold MMTV responsible for any breach of security or the disclosure of Personal Information unless MMTV has been grossly and willfully negligent.

9. Data Retention

We retain Personal Information or Sensitive Personal Data or Information so long as you are a subscriber of our platform or as long as We believe it to be necessary for the purpose set out herein for which the Personal Information or Sensitive Personal Data or Information was collected, subject to any legal requirements for the data to be retained for longer period of time.

10. Promotional Offers :

Sometimes we send offers via email to selected groups of our customers on behalf of other business. When we do this, we do not give that business your email or mobile number or name or address. If you do not want to receive such offers, please unsubscribe your mail address.

11. Severability

- i. Each clause of this Privacy Policy shall be and remain separate from and independent of and severable from all and any other clauses herein except where otherwise expressly indicated or indicated by the context of the Privacy Policy.
- ii. The decision or declaration that one or more of the Clauses are null and void shall have no effect on the remaining clauses of this Privacy Policy.
- 12. Force Majeure

Notwithstanding anything contained in this Policy or elsewhere, MMTV shall not be held responsible for any loss, damage or misuse of your Personal Information, if such loss, damage or misuse is attributable to a Force Majeure Event. A "Force Majeure Event" shall mean any event that is beyond the reasonable control of MMTV and shall include, without limitation, sabotage, fire, flood, explosion, act of God, civil commotion, strikes or industrial action of any kind, riots, insurrections, war, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.

13. Deletion of your information

If you wish to have the information or data that you have provided to us deleted, you can always do so by sending a request to <u>feedback manoramamax@mmtv.in</u>. You may note that correction or deletion of certain information or data may lead to cancellation of your registration with the Application(s) or your access to certain features of the Application(s). You also agree and acknowledge that certain data or information cannot be corrected or deleted or are prohibited to be deleted as required under any applicable law, law enforcement requests or under any judicial proceedings.

14. Contact Us

If You require any information or clarification regarding the use of the Personal Information or this Privacy Policy, You can contact us at <u>feedback manoramamax@mmtv.in</u>.