



PRIVACY POLICY

1. Introduction:

Welcome to **Qubematic Engineering Private Limited**.

Qubematic Engineering Private Limited (Qubematic) operates **nammaswasthya.com**. **Qubematic Engineering Private Limited**, on behalf of itself and its affiliates/group companies under the brand "Namma Swasthya" ("**Namma Swasthya**", "**We**", "**Qubematic**"), is the author and publisher of the internet resource **www.nammaswasthya.com** and the mobile application 'Namma Swasthya' (together, "Website").

Our Privacy Policy governs your visit to **nammaswasthya.com**, and explains how we collect, safeguard and disclose information that results from your use of our Service.

We use your data to provide and improve Service. By using Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions ("**Terms**") govern all use of our Service and together with the Privacy Policy constitutes your agreement with us ("**agreement**").

2. Definitions:

SERVICE means the **nammaswasthya.com** website operated by **Qubematic**.

PERSONAL DATA means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

BUSINESS DATA means data about company identification from those data. (or from those and other information either in our possession or likely to come into our possession).

USAGE DATA is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).





COOKIES are small files stored on your device (computer or mobile device).

DATA CONTROLLER means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data/Business data are, or are to be, processed. For the purpose of this Privacy Policy, we are a **Data Controller** of your data.

DATA PROCESSORS (OR SERVICE PROVIDERS) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

DATA SUBJECT is any living individual who is the subject of Personal Data.

THE USER is the individual/Business using our Service. The User corresponds to the Data Subject, who is the subject of Personal/Business Data.

3. Information Collection and Use:

We collect several different types of information for various purposes to provide and improve our Service to you.

4. Types of Data Collected:

Personal Data

Generally some of the Services require us to know who you are so that we can best meet your needs. When you access the Services, or through any interaction with us via emails, telephone calls or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you. You hereby consent to the collection of such information by Namma Swasthya. Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:

- 0.1. First name and last name
- 0.2. contact data (such as your email address and phone number);
- 0.3. Address, Country, State, Province, ZIP/Postal code, City
- 0.4. Cookies and Usage Data
- 0.5. demographic data (such as your gender, your date of birth and your pin code);



- 0.6. data regarding your usage of the services and history of the appointments made by or with you through the use of Services;
- 0.7. insurance data (such as your insurance carrier and insurance plan);
- 0.8. Other information that you voluntarily choose to provide to us (such as information shared by you with us through emails or letters.

The information collected from you by Namma Swasthya may constitute ‘personal information’ or ‘sensitive personal data or information’ under the SPI Rules.

“**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 to a body corporate, is capable of identifying such person.

The SPI Rules further define “Sensitive Personal Data or Information” of a person to mean personal information about that person relating to:

- i. passwords;
- ii. financial information such as bank accounts, credit and debit card details or other payment instrument details;
- iii. physical, physiological and mental health condition;
- iv. sexual orientation;
- v. medical records and history;
- vi. biometric information;
- vii. information received by body corporate under lawful contract or otherwise;
- viii. visitor details as provided at the time of registration or thereafter; and
- ix. Call data records.

Namma Swasthya will be free to use, collect and disclose information that is freely available in the public domain without your consent.

Business Data

While using our Service, we may ask you to provide us with certain Business identifiable information that can be used to contact or identify you (“Business Data”). Business identifiable information may include, but is not limited to:

- 0.1. Business Type
- 0.2. Business Name
- 0.3. Contact Number & Contact Number
- 0.4. Address & Pin Code
- 0.5. GST Number
- 0.6. Cookies and Usage Data

We may use your Business Data to contact you. with newsletters, marketing or promotional materials and other information that may be of interest to you.

Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access Service by or through any device (“Usage Data”).

This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access Service with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.



Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our service.

Examples of Cookies we use:

0.1. **Session Cookies:** We use Session Cookies to operate our Service.

0.2. **Preference Cookies:** We use Preference Cookies to remember your preferences and various settings.

0.3. **Security Cookies:** We use Security Cookies for security purposes.

0.4. **Advertising Cookies:** Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

Data

While using our Service, we may also collect the following information: sex, age, date of birth, place of birth, passport details, citizenship, registration at place of residence and actual address, telephone number (work, mobile), details of documents on education, qualification, professional training, employment agreements, NDA agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) number, Business Details, GST Number, Occupation, MOU, office location and other data.

5. Use of Data:

Qubematic uses the collected data for various purposes:

0.1. To provide and maintain our Service;

0.2. To notify you about changes to our Service;

0.3. To allow you to participate in interactive features of our Service when you choose to do so;



- 0.4. To provide customer support;
- 0.5. To gather analysis or valuable information so that we can improve our Service;
- 0.6. To monitor the usage of our Service;
- 0.7. To detect, prevent and address technical issues;
- 0.8. To fulfill any other purpose for which you provide it;
- 0.9. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- 0.10. To provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;
- 0.11. To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- 0.12. In any other way we may describe when you provide the information;
- 0.13. for any other purpose with your consent.

6. Retention of Data:

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

7. Transfer of Data:

Your information, including Personal Data and Business Details may be transferred to – and maintained on – computers located outside of your state, province, country or other



governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside India and choose to provide information to us, please note that we transfer the data, including Personal Data, to India and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Qubematic will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

8. Disclosure of Data:

We may disclose Personal and Business information that we collect, or you provide:

0.1. Disclosure for Law Enforcement.

Under certain circumstances, we may be required to disclose your Personal Data and Business Details if required to do so by law or in response to valid requests by public authorities.

0.2. Business Transaction.

If we or our subsidiaries are involved in a merger, acquisition or asset sale, your Personal and Business Data may be transferred.

0.3. Other cases. We may disclose your information also:

- 0.3.1. To our subsidiaries and affiliates;
- 0.3.2. To contractors, service providers, and other third parties we use to support our business;
- 0.3.3. To fulfill the purpose for which you provide it;
- 0.3.4. For the purpose of including your company's logo on our website;
- 0.3.5. For any other purpose disclosed by us when you provide the information;



0.3.6. With your consent in any other cases;

0.3.7. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

9. Security of Data:

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal and Business Data, we cannot guarantee its absolute security.

10. Your Data Protection Right Under Information Technology Act, 2000, inter alia:

- 0.1. Section 43A of the Information Technology Act, 2000;
- 0.2. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “SPI Rules”).
- 0.3. Regulation 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.

This Privacy Policy states the following:

- 0.1. The type of information collected from the Users, including Personal Information and Sensitive Personal Data or Information relating to an individual;
- 0.2. The purpose, means and modes of collection, usage, processing, retention and destruction of such information; and
- 0.3. How and to whom Namma Swasthya will disclose such information.

Please note that we may ask you to verify your identity before responding to such requests. Please note, we may not be able to provide Service without some necessary data.



11.END-USERS NOTE:

This section applies to all End-Users.

- 11.1. As part of the registration/application creation and submission process that is available to End-Users on this Website, certain information, including Personal Information or Sensitive Personal Data or Information is collected from the End-Users.
- 11.2. All the statements in this Privacy Policy apply to all End-Users, and all End-Users are therefore required to read and understand the privacy statements set out herein prior to submitting any Personal Information or Sensitive Personal Data or Information to Namma Swasthya, failing which they are required to leave the Namma Swasthya immediately.
- 11.3. If you have inadvertently submitted any such information to Namma Swasthya prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is collected, processed, stored, used or disclosed, then you may access, modify and delete such information by using options provided on the Website. In addition, you can, by sending an email to connect@nammaswasthya.com, inquire whether Namma Swasthya is in possession of your personal data, and you may also require Namma Swasthya to delete and destroy all such information.
- 11.4. End-Users' personally identifiable information, which they choose to provide on the Website is used to help the End-Users describe/identify themselves. Other information that does not personally identify the End-Users as an individual, is collected by Namma Swasthya from End-Users (such as, patterns of utilization described above) and is exclusively owned by Namma Swasthya. Namma Swasthya may also use such information in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, and may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. In particular, Namma Swasthya reserves with it the right to use anonymized End-User demographics information and anonymized End-User health information for the following purposes:
 - I. Analyzing software usage patterns for improving product design and utility.
 - II. Analyzing such information for research and development of new technologies.



- III. Using analysis of such information in other commercial product offerings of Namma Swasthya.
 - IV. Sharing analysis of such information with third parties for commercial use.
- 11.5.** Namma Swasthya will communicate with the End-Users through email, phone and notices posted on the Website or through other means available through the service, including text and other forms of messaging. The End-Users can change their e-mail and contact preferences at any time by logging into their "Account" at www.nammastwashya.com, and changing the account settings.
- 11.6.** At times, Namma Swasthya conducts a User survey to collect information about End-Users' preferences. These surveys are optional and if End-Users choose to respond, their responses will be kept anonymous. Similarly, Namma Swasthya may offer contests to qualifying End-Users in which we ask for contact and demographic information such as name, email address and mailing address. The demographic information that Namma Swasthya collects in the registration process and through surveys is used to help Namma Swasthya improve its Services to meet the needs and preferences of End-Users.
- 11.7.** Namma Swasthya may keep records of electronic communications and telephone calls received and made for making appointments or other purposes for the purpose of administration of Services, customer support, research and development and for better listing.
- 11.8.** All Namma Swasthya employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every End-Users' Personal Information or Sensitive Personal Data and Information. Namma Swasthya has put in place procedures and technologies as per good industry practices and in accordance with the applicable laws, to maintain security of all personal data from the point of collection to the point of destruction. Any third-party data processor to which Namma Swasthya transfers Personal Data shall have to agree to comply with those procedures and policies, or put in place adequate measures on their own.
- 11.9.** Namma Swasthya may also disclose or transfer End-Users' personal and other information provided by a User, to a third party as part of reorganization or a sale of the assets of a Namma Swasthya corporation division or company. Any third party to which Namma Swasthya transfers or sells its assets to will have the right to continue to use the personal and other information that End-Users provide to us, in accordance with the Terms of Use.



11.10. To the extent necessary to provide End-Users with the Services, Namma Swasthya may provide their Personal Information to third party contractors who work on behalf of or with Namma Swasthya to provide End-Users with such Services, to help Namma Swasthya communicate with End-Users or to maintain the Website or independent third party service providers to process payment instructions including providing a payment deferral facility to End-Users in relation to the Services. These third-party service providers have access to information needed to process payments, but may not use it for other purposes. Generally these contractors do not have any independent right to share this information, however certain contractors who provide services on the Website, including the providers of online communications services, may use and disclose the personal information collected in connection with the provision of these Services in accordance with their own privacy policies. In such circumstances, you consent to us disclosing your Personal Information to contractors, solely for the intended purposes only.

12. CONFIDENTIALITY AND SECURITY

12.1. Your Personal Information is maintained by Namma Swasthya in electronic form on its equipment, and on the equipment of its employees. Such information may also be converted to physical form from time to time. Namma Swasthya takes all necessary precautions to protect your personal information both online and off-line, and implements reasonable security practices and measures including certain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of Namma Swasthya's business.

12.2. No administrator at Namma Swasthya will have knowledge of your password. It is important for you to protect against unauthorized access to your password, your computer and your mobile phone. Be sure to log off from the Website when finished. Namma Swasthya does not undertake any liability for any unauthorized use of your account and password. If you suspect any unauthorized use of your account, you must immediately notify Namma Swasthya by sending an email to connect@nammaswasthya.com , You shall be liable to indemnify Namma Swasthya due to any loss suffered by it due to such unauthorized use of your account and password.

12.3. Namma Swasthya makes all User information accessible to its employees, agents or partners and third parties only on a need-to-know basis, and binds only its employees to strict confidentiality obligations.





- 12.4. Part of the functionality of Namma Swasthya is assisting the doctors to maintain and organize such information. Namma Swasthya may, therefore, retain and submit all such records to the appropriate authorities, or to doctors who request access to such information.
- 12.5. Part of the functionality of the Namma Swasthya is assisting the patients to access information relating to them. Namma Swasthya may, therefore, retain and submit all such records to the relevant patients, or to their doctors.
- 12.6. Notwithstanding the above, Namma Swasthya is not responsible for the confidentiality, security or distribution of your Personal Information by our partners and third parties outside the scope of our agreement with such partners and third parties. Further, Namma Swasthya shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of Namma Swasthya including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the User etc.

13. CHILDREN'S AND MINOR'S PRIVACY:

- 13.1. Namma Swasthya strongly encourages parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission.
- 13.2. Although the Namma Swasthya Website and Services are not intended for use by minors, Namma Swasthya respects the privacy of minors who may inadvertently use the internet or the mobile application.

14. Service Providers:

We may employ third party companies and individuals to facilitate our Service (“**Service Providers**”), provide Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal and Business Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.





15. Analytics:

We may use third-party Service Providers to monitor and analyze the use of our Service.

16. CI/CD tools:

We may use third-party Service Providers to automate the development process of our Service.

17. Behavioral Remarketing:

We may use remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

18. Payments:

We may provide paid products and/or services within Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy.

These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information. **PLEASE NOTE:** All charges are non-refundable, so no refunds will be issued if your service is cancelled.

19. Links to Other Sites:

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.



20. Changes to This Privacy Policy:

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. A change to this Privacy Policy is effective when they are posted on this page.

21. ADDRESS FOR PRIVACY QUESTIONS

Should you have questions about this Privacy Policy or Namma Swasthya's information collection, use and disclosure practices, you may contact, the Data Protection Officer appointed by Namma Swasthya in accordance with the provisions of PDPA. We will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your personal information. If you have any grievance with respect to our use of your information, you may communicate such grievance to the Data Protection Officer:

Company Name: Qubematic Engineering Pvt. Ltd.

Brand Name: Namma Swasthya

Address: Namma Swasthya, No. 220,
3rd 'C' Cross 2nd Block, 3rd Stage,
Basaveshwaranagar, Bangalore 560079

Phone: 9620402211

Email: connect@nammaswasthya.com

