

PRIVACY POLICY

1. GENERAL

- 1.1. Sampurna Sodani Diagnostic Clinic, Indore (“**Sampurna**” “**we**”, “**us**” or “**our**”), on behalf of Feedback Medical Limited, offers a patient-centric cloud architecture designed for secure storage of patient records (“**CareLocker**”) to its users (“**User**”, “**Users**”, “**you**” or “**your**”).
- 1.2. This privacy policy (“**Privacy Policy**”) governs your use of CareLocker and describes our policies and procedures on the collection, purpose, disclosure and measures undertaken to protect the information provided to us by you. Further, it describes your rights with respect to your information and provides our contact information for privacy related queries.
- 1.3. It is hereby clarified that this Privacy Policy is generated by a computer system and does not require any physical or digital signatures.

2. DEFINITIONS

In this Privacy Policy, the following terms shall have the meanings assigned to them herein below:

- 2.1. “**CareLocker**” shall have the meaning ascribed to the term in Clause 1.1.
- 2.2. “**Sampurna**” shall have the meaning ascribed to the term in Clause 1.1.
- 2.3. “**Grievance Officer**” shall have the meaning ascribed to the term in Clause 15.1.
- 2.4. “**Personal Information**” means any information that relates to a User, which, either directly or indirectly, in combination with other information available or likely to be available with Sampurna, is capable of identifying such User.
- 2.5. “**Privacy Policy**” shall have the meaning ascribed to the term in Clause 1.2.
- 2.6. “**Sensitive Personal Information**” means such personal information which consists of information relating to;—
 - a) password;
 - b) financial information such as bank account or credit card or debit card or other payment instrument details;
 - c) physical, physiological and mental health condition;
 - d) sexual orientation;
 - e) medical records and history;
 - f) biometric information;
 - g) any detail relating to the above clauses as provided to Sampurna for providing service; and
 - h) any of the information received under above clauses by Sampurna for processing, stored or processed under lawful contract or otherwise, provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Information for the purposes of this Privacy Policy.
- 2.7. “**User**” shall have the meaning ascribed to the term in Clause 1.1.
- 2.8. “**User Data**” shall have the meaning ascribed to the term in Clause 5.

3. DATA PROTECTION LAWS

3.1. The Privacy Policy shall be governed by the Information Technology Act, 2000 and the rules made thereunder including the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011, as amended or substituted and any other applicable law for the time being in force relating to the collection, processing and storage of Personal Information or Sensitive Personal Information.

4. USER CONSENT:

- 4.1. By accepting this Privacy Policy, which prescribes terms and conditions for use of CareLocker, you expressly consent to our collection, use or disclosure of your User Data in accordance with this Privacy Policy.
- 4.2. You are not obligated to consent to collection of your User Data. It is hereby clarified that in the absence of consent, we will not be able to provide you with the corresponding services for which the consent has not been provided.

5. TYPE OF INFORMATION COLLECTED

5.1. We may collect, receive, process or store the following information/data of the User:

- 5.1.1. Contact Information: First and last name, email address, postal address, phone number, country, and other similar contact data;
- 5.1.2. Personal Information; and
- 5.1.3. Sensitive Personal Information.

(collectively referred to as the “**User Data**”)

5.2. We only collect User Data for a lawful purpose connected with a function or activity of CareLocker and what is considered necessary for achieving the purpose of CareLocker.

6. PURPOSE OF INFORMATION COLLECTED

6.1. We may collect, use or process User Data for the following purposes: or

- 6.1.1. to create and provide access to your registered account on the CareLocker application;
- 6.1.2. to deliver and improve our services in order to provide you with an efficient, safe and customized experience while using the CareLocker application;
- 6.1.3. to inform you about our services including offers, updates and security alerts;
- 6.1.4. to use your anonymized data for internal analytical and research purposes such as auditing, data analysis and research to improve our services and customer communications;
- 6.1.5. to meet any legal or regulatory requirement or comply with a request from any governmental or judicial authority;
- 6.1.6. to resolve any request, dispute, grievance or complaint raised by you in relation to your use of our services; and
- 6.1.7. to detect or monitor any fraudulent or illegal activity on CareLocker.

7. DISCLOSURE OF INFORMATION

- 7.1. We do not share your User Data with third parties for any purpose beyond the requirement for which it was originally collected, without seeking your prior consent.
- 7.2. We may disclose your information, without obtaining your prior consent, with government agencies mandated under the law to obtain information including Sensitive Personal Information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences.

8. RETENTION OF INFORMATION

- 8.1. We shall not retain any User Data for longer than is required for the purposes for which such User Data may lawfully be used or is otherwise required under any other law for the time being in force.
- 8.2. Even if we delete your User Data, including on account of exercise of your right under clause 8, it may persist on backup or archival media for audit, legal, tax or regulatory purposes.

9. USER RIGHTS

- 9.1. You have the following rights in relation to your User Data:
 - 9.1.1. Right to review the information and ensure that any User Data found to be inaccurate or deficient is corrected or amended.
 - 9.1.2. Right to withdraw your consent provided earlier, at any time while availing the services or otherwise. However, if you withdraw your consent, we may no longer be able to provide you with the corresponding service for which you have withdrawn your consent. It is hereby clarified that all acts done in relation to your User Data for a period prior to your withdrawal of consent shall not be affected by such withdrawal of consent.

10. SECURITY PRACTICES AND PROCEDURES

- 10.1. We have implemented appropriate security practices and standards and have a comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business.
- 10.2. We have implemented appropriate security control measures to protect against information security breach including unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss.
- 10.3. We shall conduct audit of our security practices and standards in accordance with Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011.
- 10.4. We shall not be liable for any breach of security or for any action of any third parties that receive your User Data or events that are beyond our reasonable control including, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.

11. POLICY FOR MINORS

- 11.1. CareLocker does not offer services for use by minors. If knowingly or unknowingly, if any individual who is under 18 (eighteen) years, has provided us their personal information, then we will connect with their parent for consent or take steps to delete the information within a reasonable time.
- 11.2. In the event an individual, below the age of 18 (eighteen), uses the services in contravention to the Privacy Policy, we shall not be held liable or responsible for any damage or injury suffered by such person.

12. UPDATING PRIVACY POLICY

- 12.1. We reserve the right to amend this Privacy Policy at any time. The Privacy Policy, as and when modified, shall be updated on our website. In case of material changes to the Privacy Policy, we shall inform you through email.

13. GOVERNING LAW

- 13.1. The terms of this Privacy Policy shall be governed and construed in accordance with the laws of Republic of India without reference to its conflict of laws principles. Any dispute regarding or arising out of this Privacy Policy shall be subject to the exclusive jurisdiction of the courts in Mumbai.

14. SEVERABILITY

- 14.1. Whenever possible, each section of this Privacy Policy shall be interpreted in a manner so as to be valid under applicable law. However, in the event any provision is held to be prohibited or invalid, such provision shall be ineffective only to the extent of such prohibition or invalidity, without invalidating the remainder of such provision or other remaining provisions of this Privacy Policy.

15. Grievance Redressal

- 15.1. Please see below the details of our Grievance Officer:-

Dr Stephen Brown
Chief Information Officer (CIO)
support@carelocker.in
("Grievance Officer")

- 15.2. If you have any questions about this Privacy Policy, the privacy practices of CareLocker, or if you want to exercise any of the rights that you are given under clause 9, you can contact the Grievance Officer.
- 15.3. The details of the Grievance Officer may be changed by us from time to time by updating this Privacy Policy.