

## **PRIVACY POLICY**

Effective date: 14 February 2019

The First Block ("**us**", "**we**", "ourselves" or "**our**") operates the [thefirstblock.live](http://thefirstblock.live) website (hereinafter referred to as the "**Website**"). Use of the Website includes accessing, browsing, or registering to use the Website including the offerings and features available on the Website ("**Service**"). This Privacy Policy ("**Privacy Policy**") informs you ("**User**") of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your personal data to provide and improve the Service. By using the 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 (defined hereinafter).

Please read this Privacy Policy before using the site or submitting any personal information.

### **PRIVACY POLICY IS PART OF OUR TERMS**

This Privacy Policy is a part of and incorporated within, and is to be read along with, the [Terms and Conditions](#) of the Website (the "**Terms**" or "**Terms and Conditions**").

### **POLICY CHANGES**

We may change and update this Privacy Policy from time to time. Such changes may be made without prior notice, but any changes will only apply to activities and information on a going forward and not retroactive basis. You are encouraged to review this Privacy Policy whenever you use our Service to make sure that you understand how any personal information you provide will be used.

### **LINKS TO OTHER WEBSITES**

The procedures and practices set forth in this Privacy Policy describe the use and disclosure of information collected only through the Website. The Website may contain links to other websites. Any personal information about you collected whilst visiting

such websites is not governed by this Privacy Policy. You are encouraged to exercise caution and review the privacy policies applicable to such websites before accessing them. You acknowledge that we shall not be responsible for and has no control over the practices and content of any website accessed using the links contained on our Website.

### **Voluntary Disclosure to Third Parties**

This Privacy Policy shall not apply to any information voluntarily disclosed by you to other Users of our Website or third parties other than Selected Third Parties (defined hereinafter).

### **COMPETENCY TO CONTRACT**

This Privacy Policy is not applicable to Users who are minors or otherwise incompetent to contract. Such Users must not provide us or other visitors with any personal information. You acknowledge that we shall not be responsible for and have no control over any information submitted by such Users on our Website.

### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

- A. **Information you give us.** You may be required to give us personal information including sensitive personal information about yourself while creating an account using the Website or websites of the Selected Third Parties (“**Account**”), or by corresponding with us by phone, e-mail or otherwise. This includes information voluntarily provided by you including but not limited to when you register to use the Website, activate your Account, use any of our Services, or when we troubleshoot problems reported by you. The information you give us may include without limitation your name, e-mail address, website address and such other information required by us from time to time for providing the Services. We may also occasionally require you to participate in optional surveys. Your personal information may be collected through such surveys.

You must ensure that all your data and/or information shared with us is accurate, correct and complete, at all times. You understand that you must promptly

inform us of any changes to your data and/or information which may impact your use of our Services. We shall not be liable or responsible for any loss or damage that may occur to you or other third parties on account of provision of incorrect data and/or information provided by a User.

**B. Information we collect about you.** With regard to each of your visits to the Service, we may automatically collect and analyse demographic and other information including but not limited to:

- Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and other similar information;
- Information about your visit, including the full Uniform Resource Locators (URL) click stream to, through and from the Service (including date and time); material or information that you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- **Metadata.** Metadata is usually technical data associated with the content you submit, post or share on the Website. Users can add or may have metadata added to their content including geolocation, date, attribution, or other data.

**C. Information we receive from other sources.** We may receive information about you if you use any of the other websites/apps we operate or the other services we provide. Such data may be shared internally and combined with data collected through use of the Service. We also work closely with select third parties (including, for example, sub-contractors such as advertising networks, analytics providers, search information providers) and may receive information about you from such sources. We collect non-personally identifiable information to track the total number of visitors to the Website in aggregate form and identify the type of Internet web browser (e.g., Google Chrome®) and

operating system (e.g., Windows®) used by the visitor. This information allows us continuously to improve the Service.

## **YOUR CONSENT**

By using any of the Services, you agree and consent to the collection and use of information collected in the manner described above and in accordance with this Privacy Policy. You also agree and consent to any changes made to this Privacy Policy in due course and without notice. If you do not agree with the terms and conditions of this Privacy Policy, please do not provide any information to us. If you refuse or withdraw your consent, or if you choose not to provide us with any information as required by us, we may not be able to provide you with the use of the Services.

## **COOKIES**

Our Website use cookies and tracking technology (including pixels) depending on the features offered. Cookies are small files that are placed on your device (either temporarily or until manually deleted by you) in order to distinguish you from other Users of our Website. We also use local storage to provide you with a customised experience when you browse our Website and to improve advertising. This also allows us to improve the use of our Services. Third parties may also use such cookies and tracking technology if you interact with any content provided by them through our Website.

Limited personal information may be collected through the cookies and tracking technology, including but not limited to generic information such as number of visitors, device information, etc. Further, if any personal information has been previously provided, cookies may be tied to such information.

Cookie and tracking information collected by us may be shared with third-parties which directly support our advertising/promotional activities and are involved in development/updation of our Services.

Commonly used browsers are set up to automatically accept cookies however you can modify your device's settings to either alert you when you receive cookies or block cookies. If you disable/block cookies, it may affect the performance and functionality of our Services and may also restrict your experience. If you use different devices to

access our Website, you would be required to modify each device's settings individually to suit your cookie preferences.

## **HOW WE TREAT YOUR BROWSER INFORMATION**

We analyse the log files of our Website to better understand the volume of traffic to particular areas of our Website. This information helps us to serve your information needs.

## **USES OF YOUR INFORMATION**

### **A. Information you give to us will be used to improve the Services including but not limited:**

- to inform you of promotions, offers, surveys, events, products and services, which may be of interest to you;
- to facilitate and provide the Services offered through the Website;
- to update and back-up our records;
- to carry out our obligations arising from any contracts entered into by us with you and to provide you with the information and Services that you request from us;
- to enhance the security of our Website;
- to personalise content/Services offered to you;
- to remember information to help you efficiently access your Account;
- to provide you with information about other Services we offer that are similar to those that you are already using or have enquired about;
- to provide you, or permit Selected Third Parties to provide you, with information about Services we feel may interest you. If you are a registered User, we will only contact you by electronic means (e-mail or SMS) with information about services similar to the Services being used by you;

- to notify you about changes to our Services;
- to ensure that Content from our Service is presented in the most effective manner for you and for your computing device.
- to send you Service-related notices or emails and other non-essential promotional material (Users will be provided the opportunity to opt-out of receiving such email communication by unsubscribing using the relevant link).

**B. Information we collect about you will be used by us including but not limited to:**

- administer our Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our Service to ensure that the content is presented in the most effective manner for you and for your device;
- allow you to participate in interactive features of our Services, if any, when you choose to do so;
- our efforts to keep our Website safe and secure;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- make suggestions and recommendations to you and other Users about Services that may interest you or them.

**C. Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**DISCLOSURE AND DISTRIBUTION OF YOUR INFORMATION**

We reserve the rights to distribute any information that you (i) voluntarily disclose to us or (ii) chose to make public to any third party. You acknowledge your personal information and other data may be exported outside of India. Your

personal information may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your personal information under relevant foreign laws. You acknowledge that the privacy standards of those countries may be lower than those followed in India.

We further reserve the rights to distribute your personal information to any third party, including but not limited to, in the following circumstances:

A. **For Crime Prevention or Investigation.** We may share this information with government/enforcement agencies or other companies assisting us, when we are:

- Obligated under the applicable laws or in good faith to respond to court orders and processes; or
- Responding to claims that an advertisement, posting or other content violates the intellectual property rights of a third party;
- Under a duty to disclose or share your personal data in order to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others.

B. **For Internal Use.** We may share this information:

- With any member of our Group. The term “Group” includes, with respect to any person, any entity that is controlled by such person, or any entity that controls such person, or any entity that is under common control with such person, whether directly or indirectly, or, in the case of a natural person, any Relative (as such term is defined in the Companies Act, 2013) of such person.
- In the event that we sell any business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets.

- If Website or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
  
- C. **With Selected Third Parties.** We or our Group entities may disclose and share your personal information with selected business partners and third parties to provide Services (“**Selected Third Party**”).
  
- D. **With Advertisers and advertising networks.** We do not disclose sensitive personally identifiable information about our Users to any advertisers, but we may provide them with aggregate information about our Users (for example, we may inform them that any given number of women in a specified age group clicked on their advertisement on any given day) to Selected Third Party and serve relevant adverts to you. We may also use such aggregate information to help advertisers reach the kind of audience they want to target.

#### **DATA SECURITY PRECAUTIONS**

Sensitive Personal Information refers to data, whether true or not, about an individual: (i) who can be identified from that data; or (ii) from that data and other information to which we have or are likely to have access. Your personal data is accessible only by us and Selected Third Parties, and is otherwise kept secure.

We have in place appropriate technical and security measures to prevent unlawful access to or accidental loss of information collected including those prescribed under applicable laws. All information you provide to us is stored on our secure servers. We use firewalls on our servers. Any information collected during processing of payment transactions electronically will be encrypted using Secure Socket Layer (SSL) technology. Where we have given you (or where you have chosen) a username and password which enables you to access certain parts of our Website, you are responsible for keeping these details confidential. We ask you not to share your password with anyone. You must log out when you leave any section of our Website protected by a password. We recommend closing the browser completely and re-opening it before accessing other websites over the internet.



Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee, give no warranties, and shall not be liable for breach of the security of your data transmitted through the Website due to malicious attacks, errors, commission or omissions not wilfully initiated by us. Any transmission is at your own risk. Once we have received your information, we will use strict physical, electronic, and procedural safeguards to try to prevent unauthorised access.

#### **DATA RETENTION**

We may, at our sole discretion, retain any information and/or data provided by you for as long as your Account is active or as necessitated under applicable laws. The retention period may be extended in accordance with the applicable laws.

We make no warranties and shall not be liable regarding non – availability or non – retention of any information and/or data provided by you beyond the deletion of your Account.

#### **YOUR RIGHTS**

You may deal with your personal information available with us in the following ways:

- You may correct, amend, add or update personal information from your Account at any time by logging in to your Account.
- We may retain all or some of your data. Copies of public content may be retained indefinitely in our systems, including in cached and archived pages of our Website, or if other Users have copied or saved that information.

#### **PRIVACY CONTACT INFORMATION**

If you have any queries, concerns, or comments with regards to anything contained in our Privacy Policy, you may contact us by sending an email to [hello@thefirstblock.live](mailto:hello@thefirstblock.live)

#### **SERVICE' SECURITY**

The Website stores all data with the Amazon Web Services (AWS) Platform provided by AWS which may store this data on its servers located outside of India. AWS has

security measures in place to protect the loss, misuse and alteration of the information. These measures adopted by the AWS and certain additional measures adopted by us are detailed in the [Manual of Data Security Practices and Procedures](#). You acknowledge you have reviewed and understood the Manual of Data Security Practices and Procedures and that these are reasonable security practices and procedures that are commensurate with the information assets being protected. You also acknowledge that the standards followed by AWS are not within our control and are liable to change from time to time. You agree that it is in your interest to review from time to time the security standards, practices and policies adopted by the AWS to confirm that there are no changes that you are not comfortable with.

AWS can be contacted [here](#).