

OUR PRIVACY POLICY

Overview:

This **Privacy Policy** outlines **Deft Marketers Private Limited**'s approach to Data Protection and Privacy to fulfill its obligations under the **applicable laws and regulations**. This Privacy Policy applies to your Personal Data which is processed by us, whether in physical or electronic mode.

This Privacy Policy describes how ***Deft Marketers Private Limited and its affiliates including C&F and Direct Sellers***, (collectively "Company") collect and process your personal information through websites, Mobile Application etc.

By using Company Website, you agree to our use of your personal information (including sensitive personal information) in accordance with this Privacy Notice, as may be amended from time to time by us at our discretion. You also agree and consent to us collecting, storing, processing, transferring, and sharing your personal information (including sensitive personal information) with third parties or service providers for the purposes set out in this Privacy Notice.

Meaning:

“**Personal data**” means any information that relates to an identified or identifiable individual, and can include information about how you engage with our Company (e.g., device information, IP address).

“**Products**” means the products that Deft Marketers offers to the consumer are covered by this Policy.

Our “**End User**” are those Customers which Deft Marketers directs to individuals (rather than entities) so that those individuals do business directly with Deft Marketers.

“**Company**” means Deft Marketers Private Limited are covered by this Policy.

Depending on the context, “you” means End User and Visitor:

- When you directly use an End User Service (such as when you sign up for Link, or make a payment to Deft Marketers in your personal capacity), for your personal use, we refer to you as an “*End User.*”
- When you visit a Site without being logged into a Company account or otherwise communicate with Company, we refer to you as a “*Visitor.*” (e.g., you send Deft Marketers a message asking for more information because you are considering being a user of our products)

Context:

In this Privacy Policy, the expressions ‘Personal Data’, ‘Data Subject’, ‘Controller’, ‘Processor’ and ‘Processing’ shall have the meanings given to them in the **applicable privacy laws.**

We are committed to treating data privacy seriously. It is important that you know exactly what we do with your Personal Data.

Throughout this document, “we”, “us”, “our”, “ours” refer to **DEFT MARKETERS PRIVATE LIMITED.**

Wherever we have said ‘you’ or ‘your’, this means YOU.

Scope:

Deft Marketers is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, Deft Marketers is committed to the appropriate protection and use of personal information (sometimes referred to as "personally identifiable information" or "PII") that has been collected online.

Generally, our intent is to collect only the personal information that is provided voluntarily by online visitors so that we can offer information and/or services to those individuals. Please

review this Privacy Statement ("Privacy Statement") to learn more about how we collect, use, share and protect the PII that we have obtained

The privacy policy will assist in protecting the information through online content. It has been committed to ensure that your information privacy policy will be considered protected and confidential. Whatever information will be collected from our side, we ensure that we will take reasonable steps for protecting the information and ensures to make it confidential. This policy will assist in how we collect the personal information, how the information shall be processed, how we will share the personal information, for how much time we will protect the information and how you can contact us in case of any concern with regard to privacy practices.

Applicable laws:

The Consumer Protection Act, 2019, The Consumer Protection (Direct Selling) Rules, 2021, Information Technology Act, 2000 and Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

User

User Refers to who provide the personal information such as Consumer, Direct seller, Employee, Business associates

Purpose:

How Deft Marketers Private Limited Business collects and uses *Users personal information* for the following purposes:

- a. For Registration purpose.
- b. For KYC updating purpose.
- c. For Products dispatch purpose.
- d. To Issue Commission.

Roles We Play

We play the role of a Data Controller when we collect and process Personal Data about you.

We play the role of a Data Processor when we collect and process Personal Data on behalf of another Data Controller

Our Commitment

We commit to protecting your privacy and hence our Personal Data handling practices are continually reviewed to ensure compliance with the applicable Privacy laws and regulations

How we collect the information when ever you visit the website

Personal identification information

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site place an order fill out a form subscribe to the newsletter, to purchases the product or in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, father/husband name, gender, email address, mailing address, phone number, Users may, however, visit our Site anonymously. We will collect personal identification information from Users to fulfill their KYC, except that it may prevent them from engaging in certain Site related activities.

This refers to information that lets us know who you are or things specifically about you.

A. Visitors

You can browse our website without sharing any Personally Identifiable Information. If you want to register with us as a Direct Seller or place an order, you may voluntarily provide your Personally Identifiable Information (name, address, email address or telephone number) to be shared with a registered Deft Marketers Direct Seller for the purpose of assisting you with registration and order placement. We might also maintain a record of your contact information to help us provide better services in case you contact us again.

B. Ordering

When you place an order on our website or at the place of C&F, Personally Identifiable Information (such as name, contact info, order info, Payment and other transaction info) will be collected for the purpose of processing and delivering your order. We may also provide certain necessary order details to our shipping partners to complete the delivery of the order.

C. Payment

The Payment methods i.e., Debit Card, Credit Card, Internet Banking, etc. Information collected for online shopping is used only to process payments for the orders and, is not retained on our website. The information is securely transmitted to the bank, and we store only the reference number and amount paid information provided by the bank.

D. Surveys and Promotions

You may voluntarily provide Personally Identifiable Information to participate in occasional surveys, user polls or to answer questionnaires. This information is used by us to better our products and services. We may also use this information to provide you marketing and promotional material. If you do not wish to receive any such material, you can adjust the setting for the same through a link provided in the email communication or send us an email at customercare@deftmarketers.in

Non-personal identification information

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

Web browser cookies

Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

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All material in this policy is the property of Deft Marketers private limited. Any reproduction or publication thereof in any form or by any means whether electronic, mechanical, photocopying, cyclostyle, recording or usage in any manner whatsoever without the prior written permission of the Deft Marketers private limited, will invite civil and criminal action.

Children's Privacy

Our website neither targets nor is intended for children below the age of 18. Personally Identifiable Information will not be collected from children on purpose and if we discover such data on our site, the same will be deleted.

Amendments or Modifications, if any

Deft Marketers Private Limited has the discretion to update or modify this privacy policy at any time. Whenever we update the data with regard to privacy policy, we encourage user to frequently check this page for any modifications for the purpose of staying informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

Acceptance for Terms of service

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our Site. Continuous use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

Reason for Disclosing personal data to other parties:

We may disclose your Personal Data to others where it is lawful to do so including where we or they:

- need to provide you with products or services
- where you have initiated a payment
- have a legal obligation to do so, e.g., to assist with detecting and preventing fraud,
- have requirement in connection with regulatory reporting, litigation or asserting or defending legal rights and interests
- have a legitimate business reason for doing so
- want to send you information and promotional material regarding our products and services,
- have asked you for your consent to share it, and you've agreed
- Improve your online experience for using our product.

To whom your Personal Data may be disclosed:

We may disclose your Personal Data for the above purposes to other parties including:

- Other group companies and any subcontractors, direct seller, agents or service providers who work for us or provide services to us or group companies (including their employees, sub-contractors, service providers, directors and officers)
- Law Enforcement Authorities, Government Authorities, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities
- Statutory and regulatory bodies and authorities (including the government) investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose the Personal Data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals
- Overseas regulators
- Anybody else that we've been instructed to share your Personal Data with by you.

Your Rights

If Company processes personal information about you, you have the following rights:

Access and correction: you have the right to access to that data. This is sometimes called a 'Subject Access Request'. If we agree that we are obliged to provide personal information to you, we will provide it to you free of charge. Before providing personal information to you, we may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. If the information we hold about you is incorrect, you are entitled to ask us to correct any inaccuracies in the personal information.

Object to processing: You have the right to object to us processing your personal information if we are not entitled to use it any more.

Other Rights: In addition, you may have rights to have your information deleted if we are keeping it too long, have its processing restricted in certain circumstances and/or to obtain copies of information we hold about you in electronic form.

You can make a request or exercise these rights by contacting Deft Marketers

at data@deftmarketers.in and we will make all reasonable and practical efforts to

comply with your request, so long as it is consistent with applicable law and professional standards.

Data security and integrity

Company has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite Deft Marketers best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We retain personal data for as long as it is needed to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to and for other legitimate business reasons.

Links to other sites

Please be aware that Company web sites will typically contain links to other sites, including sites maintained by other firms that are not governed by this Privacy Statement but by other privacy statements that will often differ somewhat. We encourage users to review the privacy policy of each web site visited before disclosing any personal information.

By registering on any Deft Marketers web site and then navigating to another web site while still logged in, you agree to the use of your personal information in accordance with the privacy statement of the Deft Marketers web site you are visiting.

This Policy Covers to

This policy covers to all information provided by user at website or company or company's C&F

Contact Us

For any further queries and complaints related to privacy under applicable laws and regulations, you could reach us at:

Contact Email Address: data@deftmarketers.in

IN ACCORDANCE WITH INFORMATION TECHNOLOGY ACT 2000 AND RULES MADE THERE UNDER, THE NAME AND CONTACT DETAILS OF THE GRIEVANCE OFFICER ARE PROVIDED BELOW

GRIEVANCE OFFICER-

Email: grievance@deftmarketers.in, _____

Notification of Changes

We keep our Privacy Policy under regular review to make sure it is up to date and accurate. Any changes we may make to this Privacy Policy in the future will be posted on this page. We recommend that you re-visit this page regularly to check for any updates.

For any additional questions or support, reach out toefmarket:- data@ders.in