

TRIPSTER PRIVACY POLICY

Introduction

Tripster Inc. ("Tripster", "Company", "we", "us", or "our"), is committed to maintaining the privacy of personal information that you provide to us when using the Tripster application. This Privacy Policy describes how we treat personal information received about you when you visit the application. We've updated our Terms of Use, Data Policy and Cookies Policy on 24-07-2024. If you have any questions or concerns about this privacy policy or our practices with regard to your personal information, please contact us at tripsterapp.info@gmail.com.

When you use our mobile application (the "App"), and/or more generally, use any of our services (the "Services", which include the App), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Services immediately.

This privacy policy applies to all information collected through our Services (which, as described above, includes our App), as well as any related services, sales, marketing or events.

Please read this privacy policy carefully as it will help you understand what we do with the information that we collect.

Consent

By using the App and the Services, you indicate that you understand, agree and consent to be bound by the terms & conditions of this Privacy Policy. By using this app, you expressly and unconditionally grant us consent to collect, store, process and transfer your information in consonance with this Privacy Policy and the Information Technology Act, 2000.

Interpretation and Definitions

- **Interpretation**

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

- **Definitions**

For the purposes of this Privacy Policy:

- **“Account”** means a unique account created for You to access our Service or parts of our Service.
- **“Company”** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Tripster.
- **“Country”** means countries all over the world including India.
- **“Consumer”**, As per Section 2(7) of the Consumer Protection Act, 2019, the consumer is any person who buys goods or avails any service for a consideration and includes any user except for the person who has availed such services or goods for the purpose of resale or commercial use. The explanation of the definition specifically states that the expression "buys any goods" and "hires or avails any services" includes all online transactions conducted through electronic means or direct selling or teleshopping or multi-level marketing.
- **“Cookies”** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **“Data Controller”**, refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.
- **“Device”** means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- **“Personal Data”** Personal data is any information that relates to an **identified or identifiable living individual or natural persons**. Different pieces of information, which are collected together can lead to the identification of a particular person and also constitute personal data. Personal data that has been rendered **anonymous** in such a way that the individual is not or no longer identifiable is no longer considered personal data. For data to be truly anonymised, the anonymisation must be irreversible.
- **“Sale”** refers to means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's personal information to another business or a third party for monetary or other valuable consideration.
- **“Service”** refers to the Website.
- **“Service Provider”** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **“Usage Data”** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

- **“You”** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Data policy

I. What kinds of information do we collect?

To provide access to Tripster Application, we must process information about you. The type of information that we collect depends on how you use our Products.

Things that you and others do and provide.

- **Information and content you provide.** The personal information that we collect depends on the context of your interactions with us and the App, the choices you make and the products and features you use. The personal information we collect may include the following:

Personal Information provided by You. We collect names; phone numbers; email addresses; usernames; passwords; contact preferences; and other similar information.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

The personal data that you provide may be shared with other people using the application.

- We collect content, communications and other information you provide when you use our Products, including when you sign up for an account, create or share content and message or communicate with others. This can include information in or about the content that you provide, such as the location of a photo or the date a file was created. It can also include what you see through features that we provide, such as our camera, so we can do things such as suggest masks and filters that you might like, or give you tips on using camera formats. Our systems automatically process content and communications that you and others provide to analyze context and what's in them for the purposes described below. Learn more about how you can control who can see the things you share.
- **Data with special protections:** You can choose to provide information about your social media or life events about your religious views, political views, who you are "interested in" or your health. This and other information (such as racial or ethnic origin, philosophical beliefs or trade union membership) could be subject to special protections under the laws of your country.

- **Information that is automatically collected.** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our App.
- We automatically collect certain information when you visit, use or navigate the App. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our App and other technical information. This information is primarily needed to maintain the security and operation of our App, and for our internal analytics and reporting purposes.
- Like many businesses, we also collect information through cookies and similar technologies.
- **Networks and connections.** We collect information about the people, accounts, and Pages that you are connected to and how you interact with them across our Products, such as people you communicate with the most or groups that you are part of. We also collect contact information if you choose to upload, sync or import it from a device (such as an address book or call log or SMS log history), which we use for things such as helping you and others find people you may know and for the other purposes listed below.
- **Log and Usage Data.** Log and usage data are service-related, diagnostic usage and performance information our servers automatically collect when you access or use our App and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the App (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- **Your usage.** We collect information about how you use our Products, such as the types of content that you view or engage with, the features you use, the actions you take, the people or accounts you interact with and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products, and what posts, videos and other content you view on our Products. We also collect information about how you use features such as our camera.

- **Information about transactions made on our Products.** If you use our Products for purchases or other financial transactions (such as when you make a purchase in a game or make a donation), we collect information about the purchase or transaction. This includes payment information, such as your credit or debit card number and other card information, other account and authentication information, and billing, delivery and contact details

Device information.

As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our Products, and we combine this information across different devices you use. For example, we use information collected about your use of our Products on your phone to better personalize the content (including ads) or features that you see when you use our Products on another device, such as your laptop or tablet, or to measure whether you took an action in response to an ad that we showed you on your phone on a different device.

Information we obtain from these devices includes:

- **Device attributes:** information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Device operations:** information about operations and behaviours performed on the device, such as whether a window is in the foreground or background, or mouse movements (which can help distinguish humans from bots).
- **Identifiers:** unique identifiers, device IDs and other identifiers, such as from games, apps or accounts that you use, and Family Device IDs.
- **Device signals:** Bluetooth signals, information about nearby Wi-Fi access points, beacons and mobile phone masts.
- **Data from device settings:** information you allow us to receive through device settings that you turn on, such as access to your GPS location, camera or photos.
- **Network and connections:** information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed and, in some cases, information about other devices that are nearby or on your network, so we can do things such as help you stream a video from your phone to your TV.
- **Cookie data:** data from cookies stored on your device, including cookie IDs and settings.

Location Data. We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the App. For example, we may use GPS and other technologies to collect geolocation data that tells us your

current location (based on your IP address). You can opt-out of allowing us to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note, however, if you choose to opt-out, you may not be able to use certain aspects of the Services.

Information collected through our App.

We collect information regarding your geo-location, mobile device, push notifications, when you use our App.

If you use our App, we also collect the following information:

- **Geo-Location Information.** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our App, to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's calendar, camera, contacts, microphone, reminders, SMS messages, storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our App, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID and information about the features of our App you accessed.
- **Push Notifications.** We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt-out of receiving these types of communications, you may turn them off in your device's settings.

The information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes.

II. How do we use this information?

We use personal information collected via our App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with

you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

To facilitate account creation and logon process.

If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.

Provide, personalise and improve our Products.

We use the information that we have to deliver our Products, including to personalise features and content (including your ads, feed, trending videos, etc.) and make suggestions for you (such as groups or blogs that you may be interested in or topics that you may want to follow). To create personalised Products that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data that we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with our Products; and the people, places or things that you're connected to and interested in on and off our Products.

- **Location-related information:** We use location-related information – such as your current location, where you live, the places you like to go, and the businesses and people you're near to provide, personalise and improve our Products, including ads, for you and others. Location-related information can be based on things such as precise device location (if you've allowed us to collect it), IP addresses (such as check-ins or events that you attend).
- **Product research and development:** We use the information we have to develop, test and improve our Products, including by conducting surveys and research, and testing and troubleshooting new products and features.
- **Ads and other sponsored content:** We use the information we have about you – including information about your interests, actions and connections – to select and personalise ads, offers and other sponsored content that we show you. For example, when expressing an interest in obtaining information about us or our App, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).

Providing measurement, analytics and other business services.

We use the information we have (including your activity off our Products, such as the websites you visit and ads you see) to help advertisers and other partners measure the effectiveness and distribution of their ads and services and understand the types

of people who use their services and how people interact with their websites, apps and services.

To post testimonials.

We post testimonials on our App that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the consent of the testimonial. If you wish to update, or delete your testimonial, please contact us at tripsterapp.info@gmail.com and be sure to include your name, testimonial location, and contact information.

Request feedback.

We may use your information to request feedback and to contact you about your use of our App.

To enable user-to-user communications.

We may use your information in order to enable user-to-user communications with each user's consent.

To manage user accounts.

We may use your information for the purposes of managing our account and keeping it in working order.

To send administrative information to you.

We may use your personal information to send you the product, service and new feature information and/or information about changes to our terms, conditions, and policies.

To protect our Services.

We may use your information as part of our efforts to keep our App safe and secure (for example, for fraud monitoring and prevention).

To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.

To respond to legal requests and prevent harm.

If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

Promoting safety, integrity and security.

We use the information that we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products, and promote safety and security.

Communicate with you.

We use the information that we have to send you marketing communications, communicate with you about our Products and let you know about our Policies and Terms. We also use your information to respond to you when you contact us.

Researching and innovating.

We use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

III. How is this information shared?

We may process or share your data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Your information is shared with others in the following ways:

People and accounts that you share and communicate with

When you share and communicate using our Products, you choose the audience for what you share. Your network can also see actions that you have taken on our Products, including engagement with ads and sponsored content.

Public information can be seen by anyone, on or off our Products, including if they don't have an account. This includes your username, any information you share with a public audience, information in your public profile, and content you share on a public

account. You, other people using Tripster, we can provide access to or send public information to anyone on or off our Products. Public information can also be seen, accessed, reshared or downloaded through third-party services such as search engines, APIs and offline media such as TV, and by apps, websites and other services that integrate with our Products.

Content that others share or reshare about you.

You should consider who you choose to share with, because people who can see your activity on our Products can choose to share it with others on and off our Products, including people and businesses outside the audience that you shared with. Also, when you comment on someone else's post or react to their content, your comment or reaction will be visible to anyone who can see the other person's content, and that person will be able to change the audience later.

People can also use our Products to create and share content about you with the audience they choose. For example, people can share a photo of you in a story, mention or tag you at a location in a post, or share information about you in their posts or messages. If you are uncomfortable with what others have shared about you on our Products, you can learn how to report the content.

Information about your active status or presence on our Products.

People in your networks can see signals telling them whether you are active on our Products.

Apps, websites and third-party integrations on or using our Products.

When you choose to use third-party apps like google maps, websites or other services that use or are integrated with, our Products, they can receive information about what you post or share. But apps and websites that you use will not be able to receive any other information about your Tripster friends from you, or information about any of your followers (although your friends and followers may, of course, choose to share this information themselves). Information collected by these third-party services is subject to their own terms and policies, not this one.

New owner.

If the ownership or control of all or part of our Products or their assets changes, we may transfer your information to the new owner.

Sharing with third-party partners

We work with third-party partners who help us provide and improve our Products. We don't sell any of your information to anyone and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide. Here are the types of third parties that we share information with:

Partners who use our analytics services.

We provide aggregated statistics and insights that help people and businesses understand how people are engaging with their posts, listings, videos and other content on and off Tripster.

Advertisers.

We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to

contact you or identifies who you are) unless you give us permission. For example, we provide general demographic and interest information for advertisers (for example, that an ad was seen by a woman between the ages of 25 and 34 who lives in Madrid and likes software engineering) to help them better understand their audience. We also confirm which ads led you to make a purchase or take an action with an advertiser.

Measurement partners.

We share information about you with companies that aggregate it to provide analytics and measurement reports to our partners.

Partners offering goods and services in our Products.

When you subscribe to receive premium content, or buy something from a seller in our Products, the content creator or seller can receive your public information and other information that you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

Vendors and service providers.

We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analysing how our Products are used, providing customer service, facilitating payments or conducting surveys.

Researchers and academics.

We also provide information and content to research partners and academics to conduct research that advances scholarship and innovation that supports our business or mission and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

Law enforcement or legal requests.

We share information with law enforcement or in response to legal requests in the circumstances outlined below.

IV. How do we keep your information safe?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our App is at your own risk. You should only access the App within a secure environment.

However, if an individual or an organization hacks your mobile app account, we would not be responsible and will take appropriate measures to improve our security.

V. Do we collect information from minors?

We do not knowingly solicit data from or market to children under 18 years of age. By using the App, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the App. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under the age of 18, please contact us at tripsterapp.info@gmail.com.

VI. What are privacy rights?

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at tripsterapp.info@gmail.com.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example, to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt out, you may:

- Contact us using the contact information provided.

VIII. How can I manage or delete information about myself?

We provide you with the ability to access, rectify, port and delete your data.

We store data until it is no longer necessary to provide our services, or until your account is deleted – whichever comes first. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs.

When you delete your account, we delete things that you have posted, such as your photos and status updates, and you won't be able to recover this information later. Information that others have shared about you isn't part of your account and won't be deleted. If you don't want to delete your account but want to temporarily stop using the Products, you can deactivate your account instead.

IX. Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

X. Do we use google maps?

This App uses Google Maps APIs which are subject to Google's Terms of Service. You may find the Google Maps APIs Terms of Service here¹. To find out more about Google's Privacy Policy, please refer to this link. We obtain and store on your device ('cache') your location. You may revoke your consent anytime by contacting us at the contact details provided at the end of this document.

XI. How do we respond to legal requests or prevent harm?

¹ <https://policies.google.com/terms?hl=en-US>

We access, preserve and share your information with regulators, law enforcement or others:

- In response to a legal request (e.g. a search warrant, court order or subpoena) if we have a good-faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of India when we have a good-faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction and is consistent with internationally recognised standards.
- When we have a good-faith belief that it is necessary to: detect, prevent and address fraud, unauthorised use of the Products, breaches of our Terms or Policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Products), you or others, including as part of investigations or regulatory enquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-party partners about the reliability of your account to prevent fraud, abuse and other harmful activity on and off our Products.

Information that we receive about you (including financial transaction data related to purchases made on our Products) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for term breaches for at least a year to prevent repeat abuse or other term breaches.

XII. Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

XIII. How do we operate and transfer data as part of our global services?

We share information globally, both internally, and externally with our partners and with those you connect and share with around the world in accordance with this policy. Your information may, for example, be transferred or transmitted to, or stored and processed in India or other countries outside of where you live for the purposes as

described in this Policy. These data transfers are necessary to provide the services set forth in the Tripster Terms and to globally operate and provide our Products to you. We utilise standard contract clauses, rely on the European Commission's decisions about certain countries, as applicable, and obtain your consent for these data transfers to India and other countries.

If you are a resident in the European Economic Area, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

XIV. How will we notify you of changes to this Policy?

We'll notify you before we make changes to this Policy and give you the opportunity to review the revised Policy before you choose to continue using our Products.

XV. How can you contact us about this notice?

If you have questions or comments about this notice, you may email us at tripsterapp.info@gmail.com or by post to:

Tripster Inc
