

Privacy Policy

This **Privacy Policy** ("**Privacy Policy**") describes what information API Holdings Limited (formerly known as API Holdings Private Limited), ("**We**", "**Us**", "**Our**", "**Company**"), as the owner and controller of the Platform, may collect from a user ("**You**", "**Your**" or "**User**"), on or through Our website including the mobile website available at (<https://www.apiholdings.in/>) (the "**Site**"), when You access or use the Site or in relation to any other services rendered by Us ("**Services**") (collectively "**Platform**") and how We use, process, disclose and try to protect such information.

You agree and understand that the Company is responsible for operation and maintenance of the Platform and all information collected and processed on the Platform is collected and processed by Us strictly in relation to Our business.

By using Our Platform, or the Services, You confirm that You have read, understood, and agree with the privacy practices described in this Privacy Policy and the collection, use, disclosure, storage and processing of Your information in accordance with them.

This Privacy Policy is published in compliance with, inter alia:

- a) Section 43A of the Information Technology Act, 2000 ("**IT Act**");
- b) Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 ("**SPDI Rules**"); and
- c) Regulation 3(1) of the Information Technology (Intermediaries Guidelines and Digital Media Ethics Code) Rules, 2021 ("**Intermediaries Guidelines**").

General Terms:

- a) By accessing or using the Platform or the Service, or by otherwise giving Us Your information, You confirm that You have the capacity to enter into a legally binding contract under the laws of the Republic of India, in particular, the Indian Contract Act, 1872, and have read, understood and agreed to the practices and policies outlined in this Privacy Policy and agree to be bound by the Privacy Policy.
- b) You hereby consent to Our collection, use, sharing, retention and disclosure of Your information as described in this Privacy Policy. We reserve the right to change, modify, add or delete portions of the terms of this Privacy Policy, at Our sole discretion, at any time, and any continued use of the Services or the Platform, following any such amendments to the Privacy Policy, will be deemed as an implicit acceptance of the Privacy Policy in its amended form. You are requested to review the Privacy Policy (made available on the Site) from time to time to keep yourself updated with any changes; modifications made to the terms hereof.
- c) If You are accessing or using Services on the Site from an overseas location, You do so at Your own risk, and shall be solely liable for compliance with any applicable local laws.
- d) If You do not agree with any of the terms and conditions of this Privacy Policy, please do not proceed further to use this Site or any Services. If You do not provide the information We require, We may not be able to provide all the Services to you. This Privacy Policy is subject to change at any time without notice. To make sure You are aware of any changes, please review this Privacy Policy on this Site periodically.

1. What information About You is collected on the Platform?

When You access the Site or use the Service(s), You may provide, or We may collect 'Non-Personal Information' (i.e., information that cannot be used to identify you) as well as 'Personal Information' i.e., information that can be used to identify You (*as described below*). Inaccurate information may affect your ability to use the Services, the information You receive when using the Services, and Our ability to contact You. For example, your email address and contact number should be kept valid because these may be the primary channels through which we communicate with You. You are responsible for ensuring the accuracy of the personal information You submit to Us. We may collect several types of information from and about

Users, including: (i) Your personal information- Personal information is the information that can be associated with a specific person and could be used to identify that specific person whether from that data, or from the data and other information that We have, or is likely to have access to. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise. Personal information can include, but not be limited to, information such as your name, email address, contact number (cellular and landline), educational qualification(s), occupation, date of birth, marital status, monthly income, city and state of residence, number of children, employer details, , and post-qualification or work experience among other things; and/or (ii) Information about your internet connection, the equipment You use to access our Services and Your usage details. We may collect this information either (i) directly from You when You provide it to Us; (ii) automatically as You navigate through the Services (information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies); and/or (iii) from any other source of information including from other third party sources. We do not collect any Sensitive Personal Information such as information about your passwords, sexual orientation, financial information, or biometric information etc. For the purposes of this Privacy Policy, ‘Sensitive Personal Information’ shall have the meaning ascribed to it under the IT Act and the SPDI Rules. Should We specifically require Sensitive Personal Information in connection with one or more of the uses described below, We will request Your explicit consent to use such information in accordance with this Privacy Policy and/or in the ways described at the point where You were asked to disclose the data.

Given below are the types of information that We may collect:

a) Information You Give Us:

- i. Your account information: Your full name, email address, postal code, and other information You may provide with Your account, such as Your gender, mobile phone number and website. Your profile picture (if any) that will be publicly displayed as part of Your account profile. You may optionally provide Us with this information through third-party sign-in services such as Facebook, Google Plus etc. In such cases, We fetch and store whatever information is made available to Us by You through these sign-in services.
- ii. Your preferences: Your preferences and settings such as time zone and language.
- iii. Your content: Information You provide through our Services, including your reviews, photographs, comments, lists, followers, the users you follow, history, favourite categories, special requests, contact information of people you add to, or notify of, your orders through our Services, names, and other information You provide on our Services, and other information in your account profile.
- iv. Your searches and other activities: The search terms You have looked up and results You selected.
- v. Your browsing information: How long You used the Services and which features You used; the ads You clicked on.
- vi. Your communications: Communications between You and other users or third parties through the Services; your participation in a survey, poll, sweepstakes, contest or promotion scheme; Your request for certain features (e.g., newsletters, updates or other products); Your communication with Us about employment opportunities.
- vii. If You write reviews about businesses with which You conduct transactions through the Services, we may publicly display information that You transacted with those businesses.
- viii. Your Public Posts: You may provide information (such as ratings, reviews, tips, photos, comments, likes, bookmarks, friends, lists, etc.) to be published or displayed on publicly accessible areas of the Services, or transmitted to other users of the Services or third-parties (hereinafter collectively referred to as “**User Contributions**”). Your User Contributions are posted on and transmitted to others at Your own risk. Please be aware that no security measures are perfect or impenetrable (see paragraph 4 below). Additionally, We cannot control the actions of other users of the Services with whom You may choose to share the User Contributions. Therefore, We cannot and do not guarantee that the User Contributions

will not be viewed by unauthorized persons. We may display this information on the Services, share it with businesses, and further distribute it to a wider audience through third party sites and services. You should be careful about revealing any sensitive details about yourself in such postings.

- b) **Information from Other Sources:** We might receive information about You, including but not limited to Your details shared with Our partners etc. from other sources including from Our partners, advertisers or third parties.
- c) **Cookies and Other Tracking Technologies:** We utilize “cookies” and other tracking technologies. A “cookie” is a small text file that may be used, for example, to collect information about activity on the Site. Some cookies and other technologies may serve to recall information previously indicated or submitted by a User. Most browsers/mobile settings allow You to control cookies, including whether or not to accept them and how to remove them. You may set most browsers/mobile application to notify You if You receive a cookie, or You may choose to block cookies with Your browser/mobile applications. Tracking technologies may record information such as internet domain and host names, internet protocol (IP) addresses, browser software and operating system types, stream patterns, and dates and times that Our Site is accessed. Our use of cookies and other tracking technologies allows Us to improve Our Site and Your experience. At all times, You may refuse all cookies on Your browser by changing Your settings to the extent permissible on Your device. However, by doing so, You may not be able to use certain features on the Platform or take full advantage of all the offerings and interest-based advertising. You can remove cookies by following directions provided in Your mobile’s “help” file or the browser.
- d) **Third party tools and software:** We use third party SDKs. Majority of them are different payment options by which You can make a payment for an order. In order to enhance Your personal and overall experience some of the tools are used therein.
- e) **Automatic Information:** We receive and store certain types of information whenever You interact with Us. For example, We obtain certain types of information when Your web browser accesses the Site or advertisements and other content served by or on behalf of Us in on other web sites. We may also receive/store information about Your location and Your mobile device, including a unique identifier for Your device. We may use this information for internal analysis and to provide You with location-based services, such as advertising, search results, and other personalized content.

The IT Act and the SPDI Rules regulate the collection, usage, retention and disclosure of personal information.

You agree that You are providing all information to Us voluntarily.

By using our Services or accessing our Platform, You are providing Us with Your consent to Our use, collection and disclosure of the personal information. You may choose to not provide Us with personal information and, but in the event that You do so, We will be unable to provide You access to the Site or provide Services through Our Platform.

2. **How do We use the information We collect?**

- a) We collect and use information, in a variety of ways in order to provide the Services on the Site and to operate Our business, including the following:
 - i. To carry out Our obligations arising from Your requests for the Services on the Platform;
 - ii. To operate and improve the Platform in order to foster a positive user experience and to improve Our business as a whole;
 - iii. To enable Your access to Our Site to provide You Services;
 - iv. Analysing data, tracking trends, building algorithms, creating databases for rating systems, recommendations engines, etc.;
 - v. Research, growth and development of Our or Our group entities' business;
 - vi. We use the information that You provide for such purposes such as responding to Your requests, improving Our Platform or communicating with You

- vii. For non-targeting reasons such as frequency capping, compliance, billing, ad reporting , market research or product development purposes;
 - viii. To comply with applicable law;
 - ix. To conduct audits and quality assessment procedures;
 - x. To analyse the use of Our resources, troubleshooting problems and improving Our Services, by using the information regarding Your mobile device and software.
 - xi. Contacting users, both during and after an order, for updates, resolution of queries, or offering new products or services;
 - xii. To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of Our policies, or as otherwise required by applicable law;
 - xiii. To respond to any queries that You may have, and to communicate information to You, including notifications of any promotions or alerts, any changes/updates to the Site, or the introduction of any future fees or charges that We may collect at the time for provision of Our Services to You; or
 - xiv. To contact You, by way of SMS, email and phone calls, from time to time to record Your valuable feedback on Services, as they currently stand, and/or any potential products and services that may be offered in the future.
- b) We may use “cookies” information and “automatically collected” information We collect on the Platform to (i) personalize the Services, such as remembering Your information so that You will not have to re-enter it during Your visit or the next time You avail the Service; (ii) provide customized advertisements, content, and information; (iii) monitor and analyze the effectiveness of the Service and third-party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track Your entries, submissions, and status in any promotions or other activities on the Service.
- c) We may access or store Your information if it is necessary to detect, prevent or address fraud and other illegal activity or to protect the safety, property or rights of the Platform or others.
- d) We may use information regarding Your location or the location of Your device through which You access the Service for a number of purposes, including without limitation to confirm You are located in a jurisdiction in which the Service is offered.
- e) We may collect, analyze, use, publish, create and sell de-identified information, of which Your personal information might be a component, for any business or other purpose not prohibited by applicable law, including for research and marketing purposes. (collectively “**Purposes**”).

3. **Do We share the Information We receive?**

- a) Information about You and the other Users of the Platform forms an integral part of Our business. We only share the personal information as described below after ensuring that such third party has implemented measures to assure data protection measures and that are either subject to this Privacy Policy or follow practices at least as protective as those described in this Privacy Policy. By using the Site, You accept the terms hereof and hereby consent to the storage and processing of the personal information by third parties. We, have arrangements with third parties (including as mentioned below) such as affiliates or group companies, service providers, payment gateways, logistics partners and other third parties who are the intended recipients and may have access to the personal information but shall not disclose such information further to any other individual / entity. Some of the third parties include:
- i. **Third Party Service Providers:** Some of Your personal information may be shared with third party service providers for the fulfilment of Services and other allied activities thereto. We may share Your information with outside vendors that We use for a variety of purposes, such as to send You communications via emails, messages or tele-call to inform You about the Services and/or products that may be of interest to You, push notifications to Your mobile device on Our behalf, provide voice recognition services to process Your spoken queries and questions, help Us analyze use of the Services, and process and collect

payments. Some of our products, services and databases are hosted by third party hosting services providers. We also may use vendors for other projects, such as conducting surveys, organizing sweepstakes for Us, advertising, marketing and advertisement measuring purposes. We may share information about You with these vendors only to enable them to perform their services. The tools used by such third party service providers to provide the Services, may also collect Your personal information during the process of providing such Services. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by applicable law. It is clarified that We will not be responsible and liable for the acts of omissions and commissions of such third parties associated with Us. However, We may facilitate resolving any issue You may face with such third parties;

- ii. **Our Legal obligations:** We may release account and other personal information when We believe in good faith that such release is appropriate to comply with applicable law including but not limited to: (i) conforming to legal requirements or complying with legal processes; (ii) protect rights or property or affiliated companies; (iii) prevent a crime or in interest of national security; or (iv) protect personal safety of the Users or the public. We may also disclose Your personal information to enforce or apply Our policies and other agreements; or protect the rights, property or Our safety, safety of Our Users or others. This includes exchanging information with other companies, organisations, government or regulatory authorities for fraud protection and credit risk reduction;
 - iii. **Sharing upon merger or amalgamation or intra-group transfer:** Any third party to which We transfer or sell Our assets, merge or consolidate with, will have the right to continue to use the information provided to Us by You, in accordance with this Privacy Policy. We may disclose information to Our partners, affiliates, subsidiaries, group entities, investors, stakeholders or potential associates in an anonymized and aggregate manner, so that they too may understand how Users use Our Site and enable Us to create a better overall experience for You; and
 - iv. **Improving Our business:** You acknowledge that We have a right to use Your information for improving Our Services, marketing and promotional efforts, and customize Your experience. These uses improve the Site, and the Services, and better tailor it to meet Your needs, so as to provide You with an efficient, safe and customized experience. We may transfer such personal information to a third party, including persons outside India, to improve product and Service offerings while taking commercially reasonable steps to try and ensure, that the recipient adheres to the applicable laws for ensuring data protection as is adhered by Us.
 - v. **Consent:** We may share Your information in any other circumstances where We have Your consent.
 - vi. To third-parties to market their products or services to You which We feel may be of interest or beneficial to You.
 - vii. To fulfill the purpose for which You provide it.
 - viii. If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our Users or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
 - ix. For any other purpose disclosed by Us when You provide the information.
 - x. **Social Networks:** If You interact with social media features on the Services, such as the Facebook Like button, or use Your social media credentials to log-in or post content, these features may collect information about Your use of the Services, as well as post information about Your activities on the social media service. Your interactions with social media companies are governed by their privacy policies.
- b) **Transfer to third parties and outside India:** Subject to applicable law, We may at Our sole discretion, transfer personal information to any other body corporate (as defined under the

Information Technology Act, 2000) that ensures at least the same level of data protection as is provided by Us under the terms hereof, located in India or any other country. By using the Site, You accept the terms hereof and hereby consent to Us, sharing with and/or processing of Your personal information by third parties, including in any location outside India, provided that they ensure that Your sensitive personal information is protected in compliance with standards that are comparable to the standards of protection afforded to it in India or equivalent international standards.

4. **How Secure Is Information About Me?**

- a) We maintain electronic, physical and procedural safeguards in connection with the collection, storage and disclosure of personal information. Our security procedures may warrant that We may occasionally request proof of identity before We disclose personal information to You.
- b) We work to protect the security of Your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information You input in addition to maintaining security of Your information as per the international standards on "Information Technology Security Techniques Information Security Management System-Requirements".
- c) We restrict access to personal information, to Our employees, agents and third parties who need to know that information in order to process it for Us, and who are subject to strict contractual confidentiality obligations, and may be disciplined or whose relationship with Us may terminate if they fail to meet these obligations.
- d) Under certain circumstances, We shall not be able to take Your prior consent before disclosing Your information in case the information is demanded by government agencies or otherwise mandated under law to obtain sensitive personal information, or during investigation of cyber incidents, prosecution of offenses etc.
- e) Further, We shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond Our reasonable control 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.

5. **What Information Can I Access?**

The Platform gives You access to a broad range of information about Your account and Your interactions with the Platform for the limited purpose of viewing and, in certain cases, modifying, deleting information provided on the Site. You have the option to opt-out of optional services such as receiving promotional materials etc. and should You desire to opt-in to such services at the time of signing up You can choose do so.

6. **Are Children Allowed to Use the Platform?**

Use of the Site is available only to persons who can form a legally binding contract under the Indian Contract Act, 1872. If You are under 18 years of age, then please do not use or access the Service(s) at any time or in any manner. If We learn that a person under 18 years of age has used or accessed the Platform or Service or any personally identifiable information has been collected on the Platform from persons under 18 years of age, then We will take the appropriate steps to delete this information. If You are a parent or guardian and discover that Your child under 18 years of age has obtained an account on or otherwise accessed the Service, then You may alert Us at contact details provided below and request that We delete that child's personally identifiable information from Our systems.

7. **Third-party links**

- a) This Privacy Policy applies only to the information collected through the Site or, in email, text and other electronic communications sent through or in connection with the Services. This Privacy Policy does not apply to the information that a User provides to, or that is collected by, any third-

- party, that the User uses in connection with the Services. We encourage every User to consult directly with such third parties about their privacy practices.
- b) The Site may also include hyperlinks to various external websites, and may also include advertisements, and hyperlinks to applications, content or resources (“**Third Party Links**”). We have no control over such Third Party Links present on the Site, which are provided by persons or companies other than Us. You acknowledge and agree that We are not responsible for any collection or disclosure of Your information by any external sites, applications, companies or persons thereof. The presence of any Third Party Links on Our Site, cannot be construed as a recommendation, endorsement or solicitation for the same, or any other material on or available via such Third Party Links.
 - c) You further acknowledge and agree that We are not liable for any loss or damage which may be incurred by You as a result of the collection and/or disclosure of Your information via Third Party Links, as a result of any reliance placed by You on the completeness, accuracy or existence of any advertising, products services, or other materials on, or available via such Third Party Links. This will include all transactions, and information transmitted therein, between You and any such third party sites or applications or resources, such transactions are strictly bi-partite. We shall not be liable for any disputes arising from or in connection with such transactions between You and the aforementioned third parties.
 - d) Such third party websites, and external applications or resources, accessible via the Third Party Links may have their own privacy policies governing the collection, storage, retention and disclosure of Your information that You may be subject to. We recommend that You exercise reasonable diligence, as You would in traditional offline channels and practice judgment and common sense before committing to any transaction or exchange of information, including but not limited to reviewing the third party website or application’s privacy policy.

8. **Retention of Information**

- a) Any personal information or SPDI collected in accordance with this Privacy Policy will be collected by Us and retained or stored either by Us or by (i) Amazon Web Services, located at Amazon Internet Services Private Ltd, Block E, 14th Floor, Unit Nos. 1401 to 1421 International Trade Tower, Nehru Place, New Delhi, Delhi, 110019, (ii) GCP, located at Google Asia Pacific Pte. Ltd., 70 Pasir Panjang Road, #03-71, Mapletree Business City, Singapore 117371, or (iii) MongoDB Cloud located at MongoDB Limited, VAT Registration #: IE 9793087U, Building Two, Number One Ballsbridge, Dublin 4, Ireland
- b) We may, reserve the right to retain and store Your personal information for Our business purposes, whether such personal information has been deleted or not. After a period of time, Your data may be anonymized and aggregated and then may be held by Us as long as necessary, to enable purchases of products and provision of services, for analytics purposes or for any other purpose.
- c) If You wish to withdraw Your consent for processing Your personal information, or request that We no longer use Your personal information to provide You Services, please contact Us at details indicated in the contact section. Please note however that Your withdrawal of consent or cancellation of account may result in Us not being able to provide You with the Services, or terminate any existing relationship that We may have with You.

9. **Changes to Your Information**

- a) You may review, correct, update, change the information that You have provided by logging into Your account. However, You are not permitted to delete any part of the personal information or any other information generated on the Platform. You may update Your information at any point by writing to Us at the details indicated below in the contact section.
- b) Should You choose to update Your personal information or modify it in a way that is not verifiable by Us, or leads to such information being incorrect, We will be unable to provide You with access to Our Site, or the Services, and such modification may be regarded as the User seeking to discontinue his or her access to Our Site, or the Services.

- c) We reserve the right to verify and authenticate Your identity and Your personal information in order to ensure accurate delivery of Services. Access to or correction, updating or deletion of Your personal information may be denied or limited by Us if it would violate another person's rights and/or is not otherwise permitted by applicable law.

10. **Notices**

If You have any concern about privacy or grievances on the Site, please contact Us with a thorough description and We will try to resolve the issue for You. If You have any concerns or questions in relation to this Privacy Policy, You may address them to Our grievance officer at:

Name: Mr Harinder Gill

Address: 902, 9th Floor, Raheja Plaza 1, B-Wing, Opposite R-City Mall, L.B.S Marg, Ghatkopar (W) Mumbai 400086

Phone number: 022-68645200

E-mail: harinder.gill@pharmeasy.in

We shall endeavour to resolve Your grievances within one month from the date of receipt of such grievance.

11. **Miscellaneous**

- a) **Disclaimer:** We cannot ensure that all of Your personal information will never be disclosed in ways not otherwise described in this Privacy Policy. Therefore, although We are committed to protecting Your privacy, We do not promise, and You should not expect, that Your information or private communications will always remain private. As a User of the Site, You understand and agree that You assume all responsibility and risk for Your use of the Site, the internet generally, and the information You post or access and for Your conduct on and off the Site.
- b) **Indemnity:** You agree and undertake to indemnify Us in any suit or dispute by any third party arising out of disclosure of information by You to third parties either through Our Site or otherwise and Your use and access of websites, applications and resources of third parties. We assume no liability for any actions of third parties with regard to Your personal information which You may have disclosed to such third parties.
- c) **Severability:** Each clause of this Privacy Policy shall be and remain separate from and independent of and severable from all and any other clauses herein except where otherwise expressly indicated or indicated by the context of the Privacy Policy. The decision or declaration that one or more clauses are null and void shall have no effect on remaining clauses of this Privacy Policy.