

KAHA PRIVACY POLICY

We at KaHa Pte Ltd. ("KaHa", "We") know that our users ("You", "Your") care about how Your personal information is used and shared, and KaHa takes Your privacy very seriously. 'COVE®' and 'COVENET®' are the registered brand names of KaHa. Please read this Privacy Policy carefully as it details the information we collect from you, how we use and share Your information. This Privacy Policy is intended to inform you about the personal data that is collected from you, how your personal data may be used and disclosed, how you can control the use of your personal data, and how your personal data is protected when you use the mobile application downloaded by You and developed and powered by KaHa or share with us through our website (together referred to as "**Application**").

By using the Application, You accept the practices and policies outlined in this Privacy Policy, and You hereby consent to KaHa's collection, usage, and sharing of Your information as laid down in this Privacy Policy and to the collection, processing, copying, backup, storage, transfer and use of such data collected by KaHa and its service providers, in, from and to the United States, Europe, or other countries or jurisdictions potentially outside of Your own as part of the Software.

We do not sell or trade your personally identifiable information; however, we may share the same with third parties who assist us in conducting our business, operating our website/Application, or servicing you, so long as those parties agree to keep this information confidential.

Effective Date: SEPTEMBER 15, 2018

1. What Information is collected about You

1.1 Information you provide directly – There are multiple ways in which you share information directly with us.

- a. When you complete the lead generation form on our website or when you register for certain services, use or access certain functions, services or features provided by the Application, we may ask you to provide certain personal data such as name, contact number, postal address, email address, username, password, height, weight, profile photo, Your location data (if you allow access), including the real-time geographic location of Your enabled device that is used along with the Application, and location of where You launch the application may be collected if You allow us access to the same. Further, all Users of mobile application are part of the COVENET® Network, and during an SOS alert by a COVENET® Network User, the Company may use your smart wearable device to collect publicly broadcasted technical data of other devices near You.
- b. If you register through a third-party website such as Google or Facebook, then We may collect Your images/photos and other information available about You on such third-party website. We may also receive information about you from third-party social networking services when you choose to connect with those services. Further, please note where you have permitted such third-parties (including without limitation Google and/or Facebook) to collect Your usage and other data from other mobile applications, then such data shall be collected by them from our Application as well. KaHa is not responsible for the data collected or the privacy practices of such third-parties and Your use of such third-parties services is subject to the terms of use, privacy policies and any additional guidelines prescribed by such third-parties.

- c. When You nominate any of Your contacts (such as Your fitness buddies or guardians – together Your Nominees) on the Application, then You also provide us access to Your Nominee’s name, phone number, email-id and other details available on Your phone/computer. Where opted by You, Your mobile phone may send messages on Your behalf, for example, including without limitation, when you use the social networking feature (thinking about you) or when you invite another user to join the Application or where You have opted to use the Safety Notification feature in the event of an emergency etc. KaHa will have access to all such messages that are generated by the Application or You share through or from the Application and it will be able to read those messages at the time it was sent, received or on any future date.
 - d. Where You have opted to add a Nominee, Your Nominee will also have access to Your information, for example (including without limitation) Your fitness buddy can see Your fitness related data (number of steps walked, calories burnt etc.). You may also opt to share Your personal information available on the Application with Your Nominee and/or Your contacts through a third-party mobile application or website (for example through What’s app, Facebook or Google). KaHa will have access to all such information You share with Your Nominees and/or contacts.
- 1.2 Information that is automatically collected when you visit the Application or from other sources - When you download and/or visit the application, certain information may be collected automatically, which includes Your device's Internet Protocol (IP) Address, Your browser type and operating system, Your network service provider, Web pages and links you visit, advertisements you view. We may receive information about you from publicly and commercially available sources (as permitted by law).

2. How we use the information we collect

- 2.1 General - KaHa may use the information collected from you to register You or Your device for a service, to provide a service or feature You request, to reach out to You in case of any promotions or gifts, to provide customized content and make recommendations based on Your past activities on our Application. Where you have provided us information through our website to enquire about a product/service or otherwise, we may contact you for the same.
- 2.2 Advertisements – We may also use your information to provide you with product and service updates, newsletters and other communications about existing and/or new products and services by post, email, telephone, in-device messaging and/or text message (SMS), if you have provided your prior consent or we are otherwise permitted to do so under applicable law.
- 2.3 Statistics and Research - We may use your information to create user group profiles or segment data and to otherwise create anonymous, aggregated statistics about the use of our products and/or services, which we may share with third parties and/or make available to the public.
- 2.4 Product/Services Improvement - We may use your information to improve and enhance our existing products, services and Applications and develop new offerings, recommendations, advertisements and other communications and learn more about customers' preferences in general.

2.5 Publish your reviews, comments and content - Where you have uploaded product reviews, comments or content to our websites or Application and made them publicly visible, KaHa may link to, publish or publicize these materials elsewhere including in our own advertisements.

3. **To whom do we disclose your Personal Data:**

3.1 Your Nominees (Guardians, Fitness buddies) and other users of Application – Where You have opted to use certain features that require You to nominate some people as Your fitness buddy, guardian etc., then Your Nominees are intimated of the same and they can view Your name, profile photo and Your contact details at all times. Where You have opted to use the safety notification feature on the Application, then upon Your raising of a panic alarm, Your guardians will be able to track Your location in real-time. Your guardian will also have the option to assign another user in the COVENET® network to reach Your location and assist You. In such cases, such user will have access to Your location and profile photo to personally identify You. “**COVENET® Network**” shall mean the closed virtual social network of all aggregate users of the Applications.

3.2 Third-parties employed by KaHa - We may employ third party entities and individuals to facilitate our Services (e.g. maintenance, analysis, audit, marketing and development). Further, KaHa also provides certain features on the Software in association with its strategic partners (eg. Banks, payment network operators) and in accordance with the applicable laws of the land. These third parties have limited access to your information only to perform these tasks on our behalf and/or as mandated by the applicable laws of the land and are obligated not to disclose or use it for other purposes. All of our approved third-party providers go through a vetting process before being selected as a third-party provider and are bound by all relevant data privacy laws and terms of confidentiality.

3.3 Third-party mobile applications – Where You have opted to link / integrate our Application with another third-party mobile application (for example Google Fit or Apple Health), then the Application will share such relevant information as may be required for such linkage/integration. The same shall also happen when you have voluntarily shared any information available on our Application (such as calories count or number of steps completed) with another person on a third-party mobile application (such as WhatsApp).

3.4 Business transfers - Where KaHa is (or substantially all of KaHa’s assets are) acquired, or if KaHa is reorganized, Personal information would be one of the assets transferred to or acquired by a third party. If Your Personal Information will be transferred to a third party in this manner, KaHa will try to inform You of the same by posting on its website and/or this Privacy Policy or other means, so that You can delete Your registration/account with KaHa if You choose to do so. We recommend that You regularly check our website and this Privacy Policy for any updates.

3.5 Legal Requirement - There may be instances when we disclose Your information to comply with the law or respond to compulsory legal process or to verify or enforce compliance with the policies governing our services or to protect the rights, property, or safety of KaHa, or any of our respective affiliates, business partners, or customers. Please rest assured We will share Your information only after conducting a due diligence of the requirement and will only be sharing the relevant information.

4. Choices You have regarding Your Personal Information

You have many choices on how we use Your information. You can modify any of Your information, at any time, by accessing the settings in the Application and following instructions. You can always opt not to disclose information to KaHa, but keep in mind that You may not be able to utilize or optimally use some of the Application's features. You can also make choices about whether to receive promotional communications from us by following the unsubscribe instructions included in the communication. You can also uninstall the Application at any time. Please note that some information may remain in KaHa's private records even after uninstalling the Application. KaHa may use any aggregated data derived from or incorporating Your personal information after You uninstall the Application, but not in a manner that would identify You personally.

5. Security

The security of your personal data is of great importance to us. We have put in place reasonable physical and technical measures to safeguard the information we collect in connection with the Application. However, please note that although we take reasonable steps to protect your information, no Application/website, Internet transmission, computer system or wireless connection is completely secure. You should prevent unauthorized access to Your account and Personal Information by limiting access to Your phone and the Application.

6. Links to Other Websites

The Application may contain links to other websites/applications that are owned and/or operated by third-parties. KaHa is not responsible for the privacy practices or the content of other websites or applications. Such websites/applications/content is subject to the terms of use, privacy policies and any additional guidelines prescribed by such third-parties. We recommend that you check the policy of each website/application you visit to better understand your rights and obligations especially when you are submitting any type of content on those third-party website/application. Please contact the owner or operator of such website/application if you have any concerns or questions.

7. Changes to the Privacy Policy

We may update this Privacy Policy at any time to reflect changes in our practices and service offerings. If we modify this Privacy Policy, we will update the date on which the new Privacy Policy will be effective. We will notify you of any material changes in the way we treat your information by placing a prominent notice on our website/Application. You are bound by any changes to the Privacy Policy when You use the Application after such changes have been first posted.

8. Questions

If you have questions about this Privacy Policy or any grievances, please send an email to Grievance Officer at contact@coveiot.com and we will make all efforts to address them.