

“Zingobar” a brand owned by Westwell Distributors Private Limited (“Zingobar”, “we” or “us”) recognizes the importance of protecting personal details and information. This privacy policy (“Privacy Policy”) describes and will help You understand how Zingobar collects, uses and discloses Your information in connection with providing You with access to and use of our website www.zingobar.com, and any subdomains of our website or other selected domains (“Website”) and our mobile application (“App”). Our Website and the App enable You to pay for alcoholic beverages (Products) at licensed retailers/outlets. We understand that You care how information about You is used and shared, and we appreciate Your trust that we will do so carefully and sensibly. This Privacy Policy describes our practices in connection with privacy and the Personally Identifiable Information (as defined below) that we collect through the Website and/or App. Except as indicated below, this Privacy Policy does not extend to the collection, use or disclosure of information by any of our affiliates or by other third parties on any websites other than the Website and/or App.

By accessing and/or using the Website and/or App, You agree to all the terms and conditions of this Privacy Policy. We may change this Privacy Policy from time to time and without prior notice. If we make a change to this Privacy Policy, it will be effective as soon as we post it, and the most current version of this Privacy Policy will always be posted under the Privacy Policy tab of the Website and/or App. If we make a material change to this Privacy Policy, we may notify You of the same. You agree that You will check this Privacy Policy periodically. By continuing to access and/or use the Website and/or App, including after we make changes to this Privacy Policy, You agree to be bound by the revised Privacy Policy. If You do not agree to the revised terms of the Privacy Policy, You agree to discontinue using the Website and/or App.

Information We Collect Through Website and/or App

Personally Identifiable Information (or “PII”)

Personally Identifiable Information (or “PII”) means and includes information that identifies You as an individual. In order for You to take advantage of benefits provided through the Website and/or App (for example, to use the Services offered on the Website and/or App), we may require that You furnish certain PII. For example, we may ask You to complete a registration form that asks for contact information such as Your name, date of birth, telephone / mobile number, and email address or an order form that asks for financial information like Your credit card number, expiration date, security code / CVV number and billing address. Your PII may also be obtained by us during the KYC process, which is to be used for Aadhaar Authentication Services to be provided by us, in order to verify Your identity and age.

For enabling You to make payments using our Services, we may, upon Your consent, store Your financial information such as details of Your bank account (including but not limited to, the account holder's name, account name, account number, sort code, online banking PIN, transaction authentication number) or details mentioned on Your credit or debit cards or other payment instruments, that are required for a successful transaction. Note that at no point in time will Your security code / CVV number of Your credit card be stored by Zingobar or its payment gateway. We will ensure that Your PII which You have shared with us, including Your bank details, are kept safe and not shared with any third parties (except as required for the purpose of completing a transaction initiated by You on our Website and/or App), without Your consent.

Additionally, when You transact on the Website and/or App, we may collect certain consumer information (such as products ordered and relevant promotion codes) If You communicate with us by email, or otherwise complete online forms, surveys, or contest entries, any information provided in such communication may be collected as PII. You may choose not to provide us with certain personal information. In such an event, You can still access and view much of the Website and/or App; however, You may not be able to reserve any products. In addition, You can choose not to provide certain optional information, but then You might not be able to take full advantage of many of the features on the Website and/or App.

Non-Personally Identifiable Information (or "Non-PII")

Non-Personally Identifiable Information (or "Non-PII") is aggregated information, demographic information and any other information that does not reveal Your specific identity. Through Analytics, this could include Advertising Features including Demographics & Interest reporting, Remarketing, GDN Impression Reporting and Campaign Manager Integration. We and our third-party service providers may collect Your Non-PII, including information about the device You are using in accessing and/or using the Website and/or App, information from referring websites, and Your interaction with the Website and/or App. We and our third-party service providers also may aggregate PII in a manner such that the end-product does not personally identify You or any other user of the Website and/or App, for example, by using PII to calculate the percentage of our users who have a common telephone area code.

A cookie is a small piece of data that is sent to Your internet browser and stored on Your computer's hard drive, and that delivers information about You and Your activity on a web browser so it can be later read back from that browser. Pixel tags and web beacons are small graphic files that can function in various ways (such as allowing us to track how You view an email that we send You and track Your activity on the web browser) and are commonly used in conjunction with cookies. We, our third-party service providers and the third parties listed under the section "How We Use The Information We Collect", may use cookies, pixel tags, web beacons, and other similar technologies to better serve You

with more tailored information and facilitate Your ongoing use of the Website and/or App. If You do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows You to decline the use of cookies. Cookies take up minimal room on Your device and cannot damage Your device's files. Cookies work by assigning a number to the user that has no meaning outside of the assigning website.

Tracking information is automatically collected and stored as You navigate through the Website and/or App, including but not limited to, browser type, pageviews, Internet Protocol address ("IP Address"), referring/exit pages, information about how You interact with the Website's pages, third party links, and traffic and usage trends on the Website.

IP Addresses are the Internet Protocol addresses of the computer and/or mobile that You are using. Your IP Address is automatically assigned to the computer that You are using by Your internet service provider ("ISP"). Your IP Address is identified and logged automatically in our server log files whenever You visit the Website and/or App, along with the time(s) of Your visit(s) and the page(s) of the Website and/or App that You visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many websites.

When You use the App through Your smartphone or other mobile device(s), we automatically collect the device type and advertising identifier, a unique identifier generated within the device, and we may store this information.

In the case of telephonic conversations between the customer and the retail store, conversations may be recorded for feedback & quality improvement purposes.

If you wish to stop third party tracking of your information, you can choose to do so by changing it accordingly in your ads settings. Alternatively, please visit <https://tools.google.com/dlpage/gaoptout/> for the list of currently available opt outs for the web.

Applicable Laws

In this Privacy Policy, the term “Applicable Laws” shall mean all treaties, statutes, enactments, acts of legislature or parliament, laws (including rules of equity), codes, ordinances, rules, bye-laws, regulations, notifications, guidelines, policies, directions, directives and orders, decisions, decrees, permits, licenses, consents, approvals or other authorizations of any governmental authority, statutory authority, regulatory authority, tribunal, board or court in India, as amended or implemented from time to time and also applicable laws of West Bengal Excise Act and courts of Kolkata.

Notwithstanding anything provided in this Privacy Policy, we shall, at all times, comply with the provisions contained in the Information Technology Act, 2000 and the statutory rules framed thereunder, from time to time, and also with all other laws, rules and regulations, whether already in force or which may be enacted anytime in future, pertaining to data security and management, data storage, sharing and data protection, in addition to the Aadhaar (Targeted Delivery of Financial and Other Subsidies, Benefits and Services) Act, 2016, including all rules, regulations, policies, manuals, procedures, guidelines, specifications, standards and directions issued by Unique Identification Authority of India (“UIDAI”).

How We Use The Information We Collect

Personally Identifiable Information

We and our third party service providers may use Your PII and any third party PII that You may provide, as applicable:

to fulfill the requests, You have initiated on our Website and/or App, e.g., to allow You to transact successfully and provide You with information that You request;

to fulfill the purchases You have initiated on our Website and/or App (e.g., to process mobile wallet payments in connection with Your order);

to serve You the correct App version depending on Your device type;

to customise content on our Website and/or App to address Your specific needs ;

to send You important information regarding the Website and/or App, such as certain changes to our terms, conditions, policies and/or other administrative information. Since this information may be material to Your use of the Website and/or App, You may not opt out of receiving such communications, for as long as You choose to continue using the Website and/or App;

to permit You to participate in contests and other promotions either initiated by Zingobar or by any of its third party affiliates or any other third party whose products are listed on Zingobar through the Website and/or App(collectively, “Promotions”);

to inform You of products, programs, Services and Promotions that we believe may be of interest to You;

to engage with You through social media, including through direct messaging;

to allow You to rate Your transactions and view Your transaction history; and to suggest other products that You might like based on Your transaction history;

to engage with You in online surveys and use the data collected through such surveys to enhance Your experience with the Website and/or App;

to diagnose and resolve problems with our Website and/or App or servers and for other technical and administrative troubleshooting purposes;

for our internal business purposes, such as data analysis, audits, developing new products, enhancing our Website, improving our Services, identifying usage trends and determining the effectiveness of our promotional campaigns; and

for providing You uninterrupted and satisfactory Services, to administer our relationship with You, to comply with any statutory or regulatory requirement, to monitor Your use of our Services for the purposes of ensuring compliance with our user rules.

Client confidentiality and trust are important to us. Your information will be kept private and confidential at all times. We do not share Your personal information with any third party/agency for marketing / business purposes. It will be shared only if government - mandated regulatory agencies request for the same.

Non-Personally Identifiable Information

Since Your Non-PII does not personally identify You, we and our third party service providers may use such information for any purpose that is not prohibited under Applicable Law. In addition, we reserve the right to share Your Non-PII with our affiliates and with other third parties, for any purpose(including marketing and research purposes) that is not prohibited under Applicable Law. In some instances, we and our third party service providers may combine Non-PII with PII. For example, on Your personal profile page, we may display Your user name (first name and last initial), "member since" date, and the date range of when You last ordered. If we do combine any Non-PII with PII, the combined information will be treated by us as PII hereunder (for as long as it remains combined).

IP Addresses

We and our third party service providers use IP addresses for purposes such as calculating Website usage levels, diagnosing server problems, and administering the Website. Please note that we treat IP addresses, server log files and related information as Non-PII, except as required otherwise under Applicable Law. Accordingly, in general we may use and disclose IP Addresses for all the purposes for which we use and disclose Non-PII, in compliance with Applicable Law.

When & How We Share Your Information

We and our third party service providers may disclose PII:

as required to fulfill Your purchase order, initiated by You on our Website and/or App (e.g. to our partner stores to enable them to fulfill Your order);

to operate and administer Your wallet for providing Services that You have requested;

to provide services such as payment processing, website hosting, data analysis, infrastructure provision, IT services, customer service, e-mail delivery services, and other similar services, to enable them to provide services, to the extent permitted under Applicable Law;

to identify You to any person to whom You send messages through the Website and/or App;

to third parties sponsors of Promotions (irrespective of whether such Promotions are hosted by us), or otherwise in accordance with the rules applicable to such Promotions. You should carefully review the rules, if any, of each Promotion in which You participate, as they may contain additional important information about our, a sponsor's and/or other third parties' use of Your PII. In any event, any PII that is to be shared, shall only be shared in accordance with Applicable Law, irrespective of the terms of such Promotions and/or this Privacy Policy;

to an affiliate or other third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy and/or similar proceedings), provided it is in accordance with Applicable Law; and

and otherwise as required: (a) under Applicable Laws; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our operations and/or those of any of our affiliates; (f) to protect our rights, privacy, safety and/or property, and/or that of our affiliates, You and/or others; (g) to permit us to pursue available remedies

and/or limit the damages that we may sustain; and (h) for record keeping purposes, in each case, subject to Applicable Law.

Further, any PII collected and maintained by us in our logs shall be shared with any individual or entity only on a need basis, and such disclosure and / or storage of the logs maintained shall comply with Applicable Law.

Other Important Notices Regarding Our Privacy Practices

Third Party Websites

Except as expressly set forth herein, this Privacy Policy does not address, and neither we nor our third party service providers are responsible for the privacy, information or other practices of other websites and/or any third parties, including without limitation any of our affiliates and/or any third party operating any website to which the Website and/or App contains a link. The inclusion of a link to a third-party website on the Website and/or App does not imply endorsement of the linked website by us or by our affiliates. Please note that Your access and/or use of any third-party websites, including by providing any information, materials and/or other content to such websites, is entirely at Your own risk.

Security

We and our third-party service providers use reasonable organisational, technical and administrative measures to protect PII collected, stored and/or maintained by us and/or under our control. Whenever You change or access Your account information, we offer the use of a secure server. Once Your information is in our possession we adhere to strict security guidelines, protecting it against unauthorised access. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. Please do not send us sensitive information through email. If You have reason to believe that Your interaction with us is not secure (for example, if You feel that the security of any account You might have with us has been compromised), You must immediately notify us of the problem by contacting us in accordance with the “Contacting Us” section below. (Note that if You choose to notify us via physical mail, this will delay the time it takes for us to respond to the problem.)

Unsubscribe

If You do not wish to receive marketing-related emails from us, You may unsubscribe from receiving them by clicking on the “unsubscribe” link at the bottom of any of those emails.

Changing PII

You may review, correct and/or update certain elements of Your PII by adjusting Your preferences in the “My Account” section of our Website and/or App. We and our third-party service providers are not

responsible for altering PII from the databases and/or other records of third parties with whom we and our third-party service providers have shared Your PII (as permitted by Applicable Law).

Retention Period

We and our third party service providers will retain PII for the period reasonably necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

Note Regarding the Use of the Website and/or App by Minors

The Website and App are not directed to and/or intended for use by individuals under the age as mentioned under Applicable Laws, and we request that such individuals not use the Website and App and/or not provide PII through the Website and/or App.

Disclaimer

If You choose to access the Website and/or App, You do so at Your own risk, and are responsible for complying with Applicable Laws. We may limit the availability of the Website and/or App, in whole or in part, to any person, geographic area and/or jurisdiction we choose, at any time and at our sole discretion.

Consent

By using the Website and/or App and/or by providing Your information, You consent to the collection and use of the information You disclose on the Website and/or App in accordance with this Privacy Policy, including but not limited to Your consent for sharing Your information as per this Privacy Policy.

Contacting Us

If You have any questions regarding this Privacy Policy, please contact us by

Online chat : Open Zingobar's mobile application -> Click on Get Help and post a query to support@Zingobar.com