

PRIVACY POLICY

1. SCOPE

This policy (“**Privacy Policy**”) governs: (i) the manner in which Sistema Shyam Teleservices Ltd. (“**Company**”) or any person on behalf of the Company collects, receives, possesses, stores, deals or handles your information pertaining to the Internet services provided by the Company to you (“**MTS Service**”), including handling of or dealing in personal information including sensitive personal information; and (ii) the access or usage of the computer resource of the Company by any person.

The Privacy Policy is framed and published in accordance with the applicable Indian laws and regulations in this regard, including the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and the Information Technology (Intermediaries Guidelines) Rules, 2011.

2. TYPE OF INFORMATION COLLECTED

The Company may collect the following kinds of information from you (each constituting “**Subscriber Information**”):

- Details about the utilization of the MTS Service, including your browsing activities, application and feature usage, services options chosen etc.
- Some personal details about you as also shared by you through your Customer Application Form, such as your age, gender, occupation, address, pin code, locations, year of birth, phone numbers, email addresses, etc.

The Company or any person on its behalf will not collect your sensitive personal information unless: (i) it is collected **for a lawful purpose connected with a function or activity of the Company or any person on its behalf**; and (ii) the collection of your sensitive personal information is considered necessary for that purpose.

3. PURPOSE OF COLLECTION AND USAGE OF INFORMATION

The Company may use the Subscriber Information for the purposes including: (i) to verify your identity; (ii) to provide, maintain and improve the Company’s services; (iii) to raise invoices collect money from you and settle your accounts; (iv) *to measure your interest in the Company’s services*; (v) to inform you about the Company’s offers, provide other information and customize your experiences; (v) to resolve disputes, provide assistance and deal with your requests, enquiries or complaints; (vi) *to promote and market the Company’s services*; (vii) to detect, prevent and protect from fraud and other criminal activities and enforce the Company’s terms and conditions; (ix) *to perform market analysis, market research, business and operational analysis or online surveys*; (x) *to conduct data analysis or analytical studies on user behavior, user preferences, etc.*; (xi) to carry out activities related to quality control, network monitoring and maintenance, testing; etc.

4. MANNER OF COLLECTION AND USAGE OF INFORMATION

The Company may collect information from your Customer Application Form; or when you use the MTS

Service; interact with the representatives of the Company during the course of your relationship with the Company, etc.

The Subscriber Information will be used for the purpose stated in Clause 3 above.

The Company, or any person or entity authorized on its behalf, may automatically measure and monitor network performance and the performance of your connections to improve your or our service levels and products. Upon contact for service support, the Company may access information about your wireless device or other device settings to provide customized technical support or to install specific applications or services that you use or are necessary to the application or services. Information about the use of Company products and services may be aggregated or anonymized data may be used to improve services, measure and analyze the Subscriber Information for the purpose stated in Clause 3 above. The Company reserves the right to disclose, share or transfer (subject to applicable licensing conditions) the information so aggregated and/or analysed with third parties to fulfill one of the above purposes. However, no information which can specifically identify the customer including sensitive personal information will be disclosed, shared or transferred with any third party.

By virtue of this Privacy Policy, you are hereby imparted knowledge that: (i) the Subscriber Information is being collected as per Clauses 2 and 4 above; (ii) the purpose for which the Subscriber Information is being collected is provided in Clause 3 above; (iii) the intended recipients of such information are described in Clauses 4, 5 and 7 and (iv) the name and address of the agency that is collecting and retaining the information is as under:

[Name of the Company with address]

5. DISCLOSURE AND TRANSFER OF INFORMATION

The Company reserves the right to disclose the Subscriber Information to its affiliates, subsidiaries or any other third party, for the purpose stated in this Privacy Policy, or for the compliance of a legal obligation.

The Company uses vendors and partners for business purposes so as to help the Company offer, provide, repair, restore and bill for services it provides. The Company will transfer Subscriber Personal Data or Information to only such a body corporate or person in India, or located in any other country (subject to the applicable licensing conditions), that ensures the same level of data protection that is adhered to by the Company.

The Company may share the Subscriber Information with Government agencies mandated under the law to obtain information including sensitive personal information for the purpose of verification of identity, or for prevention, detection and investigation including cyber incidents, prosecution, and punishment of offences. The Company may also disclose the Subscriber Information when required to do so by law or regulation, or under any legal obligation or order under law or in response to a request from a law enforcement or governmental agency or judicial, quasi-judicial or any other statutory or constitutional authority or to establish or exercise our legal rights or defend against legal claims.

6. REASONABLE SECURITY PRACTICES AND PROCEDURES

The Company will adhere to reasonable security practices and procedures to keep your information secure. The security measures undertaken by the Company include International Standard Certification in ISO 27001:2013 upgraded Information Security Management System.

ISO/IEC 27001:2013 is an information security standard that was published on the 25 September 2013. It supersedes ISO/IEC 27001:2005, and is published by the International Organization for Standardization (“**ISO**”) and the International Electro-technical Commission (“**IEC**”) under the joint ISO and IEC subcommittee. It is a specification for an Information Security Management System.

Organizations which meet the standard are certified compliant by an independent and accredited certification body (BCMS) on successful completion of a formal compliance audit.

7. OTHER PRACTICES AND POLICIES

The Company or any person on its behalf holding your sensitive personal information will not retain that sensitive personal information for longer than is required for the purposes for which the sensitive personal information may lawfully be used or is required under any law.

The Company or any person on its behalf will permit you, as and when requested by you, to review the personal information, including sensitive personal information you have provided and ensure that any personal information or sensitive personal information found to be inaccurate or deficient is corrected or amended as feasible.

The Company will not be responsible for the authenticity of the personal information or sensitive personal information supplied by you.

The Company or any person on its behalf will, prior to the collection of Subscriber Information provide an option to you to not to provide the data or information sought to be collected. You, at any time while availing the MTS Service, will have an option to withdraw your consent given earlier to the Company. Such withdrawal of the consent will be sent in writing to the Company. In case you do not provide or later on withdraw your consent, the Company will have the option not to provide the services to you for which the said information was sought.

The Company will take such steps as are, in the circumstances, reasonable to ensure that the third parties to whom the Company discloses or transfers, or with whom the Company shares the Subscriber Information have appropriate standards of privacy and confidentiality.

The Company may share or disclose your information in connection with a merger, acquisition, reorganization or sale of assets or business or in the event of bankruptcy.

The Company encourages you to review the privacy statements of websites you choose to visit so that you can understand how those websites collect, use and share your information. The Company is not responsible for collection and use of any information belonging to you by any website you choose to visit.

8. CONSENT

This Privacy Policy is a legally binding document between the Company and you. Your consent to the terms and conditions described in this Privacy Policy in their entirety, including collection, usage, disclosure, transfer, retention, etc. of your information listed above in the manner described in this Privacy Policy shall be deemed by default post 15 days from publication of this

policy at the website. If the subscriber intends otherwise then he can do so by contacting the Grievance Officer detailed herein below.

9. GRIEVANCE OFFICER

The Company has appointed **Mr. Sanjay Goyal**, Head-Nodal Department, as the grievance officer to ensure compliance with this Privacy Policy. The contact details of the grievance officer are as follows:

Name: Mr. Sanjay Goyal
Address: 334, Udyog Vihar Phase-IV, Gurgaon-122001
Email: policysupport@mtsindia.in

10. CHANGE IN PRIVACY POLICY

This Privacy Policy may be changed or amended at any time without prior notification. If the Company decides to change the Privacy Policy, it will post those changes on its website. The Company suggests that you regularly check this Privacy Policy to apprise yourself of any updates.
