

PRIVACY POLICY

This Privacy Policy (hereinafter referred to as “Policy”) governs the manner in which Fohoway India Private Limited (hereinafter referred to as “Company” or “Fohoway” or “Us” or “We”) collects, uses, maintains and discloses information collected from user(s) of the website (hereinafter referred as “Site”). The purpose of this Policy is to inform you as to what information may be collected from you when you visit our site or when you become our Fohoway Direct Seller (hereinafter referred to as “Direct Seller”), how such information will be used by the Company and / or other persons or entities, with whom such information may be shared, your choices regarding the collection, use and distribution of such information, your ability to edit, update, correct or delete such information and the security procedures that we have implemented to protect your privacy.

This policy applies to the Site and all products and services offered by Company business. during the course of any usage of the service provided. By using the service, you agree to comply with Company policies.

I. DEFINITIONS:

- a. “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. For more information on cookies, kindly visit: www.allaboutcookies.org
- b. "Data" includes a representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by humans or by automated means;
- c. “Data principal” means the natural person to whom the personal data relates;
- d. “Direct Seller” means a person appointed by the Company on a principal-to-principal basis to undertake sale, distribution and marketing of the Company’s products and services;
- e. "Personal data" means data about or relating to a natural person who is directly or indirectly identifiable, having regard to any characteristic, trait, attribute or any other feature of the identity of such natural person, whether online or offline, or any combination of such features with any other information, and shall include any inference drawn from such data for the purpose of profiling;
- f. "Processing" means in relation to personal data, means an operation or set of operations performed on personal data, and may include operations such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction;
- g. "Sensitive Personal Data" means such personal data, which may, reveal, be related to, or constitute— (i) financial data; (ii) health data; (iii) official identifier; (iv) sex life; (v) sexual orientation; (vi) biometric data; (vii) genetic data; (viii) transgender status; (ix) intersex status; (x) caste or tribe; (xi) religious or political belief or affiliation; or (xii) any other data categorised as sensitive personal data under law.

FOHOWAY INDIA PRIVATE LIMITED

Regd. Office: Premises No. DJ1001, 1002, 1023, 1024, 10th Floor, DLF Tower B, Jasola South West Delhi - 110 025

Phone number: +91-11-41601212 **Email ID:** info@fohowayindia.com

CIN: U74999DL2019PTC358517

- h. “Usage Data” refers to data collected automatically, either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- i. “Website” refers to our website accessible at <https://www.fohowayindia.com>

II. INFORMATION WE OBTAIN:

a. Personal data

We may collect personal data from users in a variety of ways, including, but not limited to, when users visit our site, register on the site place an order fill out a form, subscribe to the newsletter and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, (as appropriate), name, email address, mailing address, phone number, users may, however, visit our Site anonymously subject to usage data being collected. We will collect personal identification information from users to fulfil their KYC, except that it may prevent them from engaging in certain Site related activities.

We obtain certain personal information in connection with the products and services we provide. The types of personal information we obtain include:

- i. Contact information, such as name, phone and fax number, and email and postal address;
- ii. Information to create your account to access the Site, such as birth date, spouse’s name, photo, preferred language, Enroller ID, Sponsor ID, online password, and, if you are a Direct Seller of the Company, Unique Identification number and equivalent Identification or PAN number and any other information as required by us or under law;
- iii. Payment information, such as name, billing address and payment card details, including card number, (expiry date and cvv code), which is collected and stored as determined by the Company under the applicable law;
- iv. Information you submit in connection with a career opportunity at Fohoway, such as contact details, information in your resume (including work history, education, language skills, certifications/licenses and work eligibility status) and details about your current employment;
- v. Company may record the conversations held when you contact our helpline phone number.

b. Usage Data

We may collect non-personal identification information about users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

This information is mostly automated with the help of cookies, web server log and other similar technologies. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s web browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

The information we obtain in this manner may include your device IP address, other identifiers associated with your devices, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of Site visits. These technologies help us (1) remember your information so you will not have to re-enter it; (2) track

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and understand how you use and interact with our products, services and Sites; (3) tailor our products, services and Sites around your preferences; (4) measure the usability of our products, services and Sites and the effectiveness of our communications; and (5) otherwise manage and enhance our products, services and Sites.

Your web browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Sites. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your mobile device. To the extent required by applicable law, we will obtain your consent before using cookies or similar tools.

c. How we use the information we obtain

We may use the information we obtain about you to:

- a) Provide our products and services to you;
- b) Send promotional materials, newsletters and other communications about our products and services;
- c) Establish and manage your account with Company;
- d) Process and fulfil orders in connection with our products and services and keep you informed about the status of your order;
- e) Identify and authenticate you so you may order our products and access the Site;
- f) Communicate about, and administer participation in, special events, programs, promotions, offers surveys, focus groups and market research;
- g) Provide the Direct Seller and customer of the Company support and respond to inquiries;
- h) Increase and maintain the safety and security of our products and services and prevent misuse of the same;
- i) Perform data analytics (including market research, trend analysis, financial analysis, anonymization and aggregation of personal information);
- j) Manage career opportunities, including for recruitment purposes, employee onboarding and other human resources purposes;
- k) Operate, evaluate, develop, manage and improve our business and the Site;
- l) Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and comply with and enforce applicable legal requirements, relevant industry standards and policies;

We also may use the information we collect about you in other ways for which we provide specific notice at the time of collection and obtain your consent if required by applicable law.

d. Notice for collection of information:

This notice applies to anyone who interacts with us in relation to our products and services, by any mode of communication. We may give you additional privacy notices if required for specific interactions.

III. WEB BROWSER COOKIES:

Our Site may use “cookies” to enhance user experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly. How we collect, use, and

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process the collected information is governed by the present policy of the Company. The information collected is for the following purposes:

- A. For Registration purpose.
- B. For KYC updating purpose.
- C. For Products dispatch purpose.
- D. To Issue Commission.

IV. INFORMATION SECURITY:

We adopt data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

But the Company shall have the right to make disclosure of information relating to the Direct seller to the Credit Information Bureau of India (CIBIL), Ministry of consumers and affairs and/or any other governmental/regulatory/statutory or private agency as required under any law of India from time to time. All information and data are furnished by the Direct seller/consumer Company from time to time shall be true and correct.

V. CONSENT:

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

VI. RETENTION PERIOD OF YOUR PERSONAL DATA:

We only keep your personal data for as long as we need it for the purpose for which we hold your personal data to meet your needs, or to comply with our legal obligations. To determine the data retention period of your data, we use the following criteria:

- a) Where you purchase products and services, we keep your personal data for the duration of our contractual relationship;
- b) Where you participate in a promotional offer, we keep your personal data for the duration of the promotional offer;
- c) Where you contact us for an enquiry, we keep your personal data for the duration needed for the processing of your enquiry;
- d) Where you create an account, we keep your personal data until you require us to delete it or after a period of inactivity.
- e) Where you have consented to direct marketing, we keep your personal data until you unsubscribe or require us to delete it or after a period of inactivity.
- f) Where cookies are placed on your computer, we keep them for as long as necessary to achieve their purposes (e.g. for the duration of a session for shopping cart cookies or session ID cookies) and for a period defined in accordance with local regulations and guidance.

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We may retain some personal data to comply with our legal or regulatory obligations, as well as to allow us to manage our rights (for example to assert our claims in courts) or for statistical or historical purposes. When we no longer need to use your personal data, it is removed from our systems and records or anonymized so that you can no longer be identified from it.

VII. RIGHTS OF DATA PRINCIPAL:

- a) Obtain confirmation whether the data is processing or has been processed;
 - b) Correction of your personal data if inaccurate or incomplete;
 - c) Erasure of your personal data in certain circumstances;
 - d) Suspension of using your personal data in certain circumstances;
 - e) Stopping the processing your personal data in certain circumstances; and
 - f) Obtaining your personal data in a structured, commonly used, and computer-readable format.
- If you wish to exercise your right, please contact our customer care.

VIII. TRANSMISSION OF INFORMATION:

Where we collect and use sensitive categories of your personal data, we will obtain your prior and explicit consent thereto, unless we are required to do so in order to perform our statutory obligations or to protect vital interest of you or another person in emergency. The sensitive personal data may be transferred outside India, but such sensitive personal data shall continue to be stored in India, but critical data would only be processed in India.

IX. USE OF VENDORS:

We may employ vendors to perform functions on our behalf, such as fulfilling orders, delivering packages, processing payments, and providing customer service. These vendors are under a contractual obligation to use confidential data received from the Company only for purposes that fall within the functions for which they were hired.

We may disclose information that we collect about you when we have reason to believe that this is necessary to identify, contact or bring legal action against persons or entities that may be harming you, us or others. We may also disclose information when we believe the law requires it.

X. MODIFICATIONS/CHANGES/AMENDMENTS TO THIS POLICY

Company has the discretion to update this policy at any time. When we do, revise the updated date at the bottom of this page. We encourage users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this policy periodically and become aware of modifications.

XI. SUGGESTIONS & COMPLAINTS:

If you have any questions about this Policy, the practices of this site, or your dealings with this site, please contact us at info@fohowayindia.com

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The Company strives to resolve any query or concern you raise about use of your personal information. However, if you believe that your personal information is not being lawfully processed by the Company under applicable Data Protection Legislation, you may lodge a complaint with the Data Protection Officer of the Company, using the contact details listed below:

- **Address : DJ-1001-1002-1023-1024 , 10th Floor , DLF Tower-B Jasola Delhi - 110025**
- **Email : customercare@fohowayindia.com**



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