

### Privacy Policy What Is RightClaim?

- The domain name www.RighttoClaim.com ("Platform") is provided by Veera Healthcare Consultancy, (hereinafter referred to as "RightClaim" or "We" or "Our" or "Us"). The Platform serves as a platform for providing insurance claim assistance ("Services") to the end users ("User").
- For providing its Services, RightClaim will host data and information. RightClaim will not review, share, distribute, or reference any such User data except as provided in the terms of use, or for providing any services, or as may be required by law. Individual records of User data may be viewed or accessed only for the purpose of the Services, resolving a problem, support issues, or suspected violation of the terms of use, or as may be required by law. RightClaim will take all reasonable precautions for maintaining confidentiality of data of the Users.
- RightClaim can be reached, for all questions and directions related to this privacy policy, by:
- Sending a letter marked to the attention of Mr. Vrajesh Brahmbhatt and RightClaim at Vraj, Mansi Co.Op. Hos. Soc Ltd., Sattadhar. Ahmedabad.
- 2. Sending an email to care@RightClaim.com.
- This privacy policy is published in compliance of:
- 1. Section 43A of the Information Technology Act, 2000;
- 2. Regulation 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the "SPI Rules"); and
- 3. Regulation 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011.
- This privacy policy states the following:
- 1. The type of information collected from the guests of the Platform and the Users, including sensitive personal data or information:
- 2. The purpose, means and modes of usage of such information; and
- 3. How and to whom RightClaim will disclose such information.

### What Is Personal Information?

- "Personal Information" is defined under the SPI Rules to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.
- The SPI Rules further define "sensitive personal data or information" of a person to mean personal information about that person relating to:
- 1. passwords;
- 2. financial information such as bank accounts, credit and debit card details or other payment instrument details;
- 3. information received by body corporate under lawful contract or otherwise;
- 4. guest details as provided at the time of registration or thereafter; and
- 5. call and message data records.
- Information that is freely available in the public domain or accessible under the Right to Information Act, 2005 or any other law will not be regarded as sensitive personal data or information.

### **Privacy Statements**

Terms For All Users:

- This section applies to all guests and Users.
- Accordingly, a condition of each User's use of and access to the Platform and to the Services is their acceptance of the terms
  of use located at https://RightClaim.com/terms-conditions/, which also involves acceptance of the terms of this privacy
  policy. Any User that does not agree with any provisions of the same is required to leave the Platform immediately.
- In order to have access to the features and benefits on our Platform, a User must first create an account on our Platform. To create an account a User is required to provide information, which such User recognizes and expressly acknowledges is personal information allowing others, including RightClaim, to identify the User. RightClaim may, in the future, include other optional requests for information from the User to help customize the Platform to deliver personalized information to the User. Without User's agreement, RightClaim will not share, rent or sell any personal information with third parties in any way other than what is disclosed in this privacy policy. However, RightClaim can use the conclusions or inferences from the data for the purposes of advancement in businesses or for joint ventures or partnerships or merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.



- All the information provided to RightClaim by a User, including sensitive personal information, is voluntary. User has the right to withdraw his/her/its consent at any time, in accordance with the terms of this privacy policy and the terms of use, but please note that withdrawal of consent will not be retroactive.
- User can access, modify, and correct the data about him/her/it which has been collected pursuant to his/her/its decision to become a User. If User updates any of his/her/its information, RightClaim may keep a copy of the information which User originally provided in its archives for uses documented herein. RightClaim takes User's rights seriously and encourages User to use them if User deems this to be appropriate. User may exercise these rights by emailing RightClaim at care@ RighttoClaims.com.
- All the information provided to RightClaim by a User, including Personal Information or any sensitive personal data or information, is voluntary. You understand that RightClaim may use certain information of yours, which has been designated as Personal Information or "Sensitive Personal Data or Information" under the SPI Rules:
- 1. for the purpose of providing you the Services;
- 2. for commercial purposes and in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes;
- 3. for sale or transfer of such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates: and
- 4. debugging customer support related issues.
- RightClaim also reserves the right to use information provided by or about the User for the following purposes:
- 1. Contacting End-Users for offering new products or services.
- 2. Contacting End-Users for taking product and Service feedback.
- 3. Analysing software usage patterns for improving product design and utility.
- 4. Analysing anonymized practice information for commercial use.
- Due to the communications standards on the Internet, when a User visits the Platform, RightClaim may receive the URL of the sites from and to which such User navigates. RightClaim also receives the Internet Protocol (IP) address of each User's computer (or the proxy server a User used to access the world wide web), User's computer operating system and type of web browser the User is using, email patterns, as well as the name of User's ISP. This information is used to analyze overall trends to help RightClaim improve its Service. The linkage between User's IP address and User's personally identifiable information is not shared with third-parties without such User's permission or except when required by law.
- The Platform uses temporary cookies to store certain data (that is not sensitive personal data or information) that is used by RightClaim and its service providers for technical administration of the Platform, research and development, and for User administration. RightClaim does not store personally identifiable information in the cookies.
- RightClaim does not knowingly collect personal data from children.
- RightClaim will not disclose any personal information or data to governmental institutions or authorities unless such
  disclosure is requisitioned under any Indian law or judicial decree or when RightClaim, in its sole discretion, deems it
  necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight frau d and
  credit risk, or to enforce or apply RightClaim's terms of use.
- In addition, User agrees that RightClaim is not responsible and does not have control over any third-parties that User authorizes to access its/his/her content. If the User is using a third-party website or service and allows them to access its/his/her content, such User shall do so at its/his/her own risk. Further, when User submits personal information to third party through RightClaim, the User should be aware that the User's personal information is transmitted across the internet and that no method of transmission over the internet is 100% secure. Although, RightClaim takes reasonable security measures to protect the User's personal information when it receives it, the User shall also ensure to take appropriate steps to protect User's personal information.
- RightClaim addresses any discrepancies and grievances of all Users with respect to processing of information in a time bound manner. For this purpose, RightClaim has designated Dhaval Parmar as the Grievance Officer, who will redress the grievances of the Users expeditiously but within 1 (one) month from the date of receipt of grievance, and who can be reached by:
- 1. Sending a letter marked to the attention of Mr. Vrajesh Brahmbhatt at Vraj, Mansi.Co.Op.Hos.Soc, Sattadhar, Ahmedabad or
- 2. Sending an email to care@RightClaim.in.

# Privacy Terms Applicable For Users:

- As part of the registration/application creation and submission process that is available to Users on the Platform, certain information, including sensitive personal data or information is collected from the Users.
- All the statements in this privacy policy apply to all Users, and all Users are therefore required to read and understand the
  privacy statements set out herein prior to submitting any sensitive personal data or information to the Company, failing
  which they are required to leave the Platform immediately.
- If you have inadvertently submitted any such information to RightClaim prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is collected, stored or used, then you may send an email to care@ RightClaim.in to modify or remove the same. In addition, any User can ask RightClaim, by sending an email to care@ RightClaim.in whether RightClaim is keeping personal data about him/her, and every User is also entitled to require RightClaim to delete and destroy all such information relating to him/her (but not other Users) in its possession.



- Users' personally identifiable information they choose to provide on the Platform is used to help the Users describe/identify themselves. Other information that does not personally identify the Users as an individual, is collected by RightClaim from Users (such as, patterns of utilization described above) and is exclusively owned by RightClaim. RightClaim may also use such information in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, and may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. If RightClaim wishes to use any User's personal data for a new purpose, it may do so without seeking such User's permission before doing so. RightClaim will communicate with the Users through email and notices posted on the Platform or through other means available through the service, including text and other forms of messaging. The Users can change their e-mail and contact preferences by sending an email to care@RightClaim.com.
- RightClaim may conduct a User survey to collect information about Users' preferences. These surveys may be optional and
  if Users choose to respond, their responses will be kept anonymous. None of this information is shared with third parties,
  except for with consent of the User. The demographic information that the Platform collects in the registration process and
  through surveys is used to help the Platform improve its Services to meet the needs and preferences of Users. This may
  include targeting advertising to Users about the Services.
- All employees and data processors of RightClaim, who have access to, and are associated with the processing of sensitive
  personal data or information, are obliged to respect the confidentiality of every User's sensitive personal data and
  information.
- We may also disclose or transfer User's personal and other information a User provides, to another third party as part of
  merger, acquisition, reorganization or sale of assets of any division of the Company or the Company as a whole. Any third
  party to which the Company transfers or sells its assets will have the right to continue to use the personal and other
  information that a User provide to Us.
- To the extent necessary to provide Users with the Services, RightClaim may provide their Personal Information to third party contractors who work on behalf of, or with, the Company to provide Users with such services, to help RightClaim communicate with Users or to maintain the Platform. Generally, these contractors do not have any independent right to share this information, however certain contractors who provide services on the Platform or the Users, including the providers of online communications services, will have rights to use and disclose the Personal Information collected in connection with the provision of these services in accordance with their own privacy policies.

### **Registration Process**

Please note that to register with the Platform and to enter into a valid contract with Us, User should be eligible to enter into and perform legally binding contracts under Indian Contract Act, 1872. RightClaim shall not be held responsible and/or liable if the User provides any false information regarding its/his/her age. RightClaim can delete any Users account/take all necessary steps, if RightClaim becomes aware that User is not eligible and has provided false personal information.

As Part Of The Registration Process, RightClaim Collects The Following Personal Information From Users:

- Name
- Mobile number
- Email address
- Adharcard Number
- Pancard Number
- National Identifier viz. Aadhar Card, Pan Card, Driving License, etc

 $Right Claim\ Also\ Collects\ The\ Following\ Personal\ Information\ From\ Users:$ 

- Email address
- Address (including country and ZIP/postal code)
- Gender
- Age
- Phone number
- [Password chosen by the User]
- Valid financial account information
- Contact and phonebook details
- National Identifier viz. Aadhar Card, Pan Card, Driving License, etc
- Access to messages on mobile network
- Other details as the User may volunteer

All the information provided by the User ("User Information") is maintained by the Platform in electronic form on its equipment, and on the equipment of its employees. User Information may also be converted to physical form from time to time. Regardless of the manner of storage, We will keep all User Information confidential, and only makes accessible User Information to its employees on a need-to-know basis, and binds all such employees to strict confidentiality obligations.

RightClaim collects financial information from the User for the sole purpose of billing and payment processes, requiring transfer of this information to third party websites/platforms, not directly in control of RightClaim, to complete the billing process. Such transactions take place over secure connections with payment gateways which involve encryption of data, ensuring best possible care



of data security. RightClaim does not retain any of financial information of the User, including credit/debit card and net-banking details, in its records.

Notwithstanding the foregoing, RightClaim shall not be responsible for any breach of security or for any actions of any third parties that receive Users' personal data or events that are beyond its reasonable control including, but not limited to, acts of government, computer hacking, unauthorised 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.

### LAST UPDATED: February 25, 2021.

This Privacy Policy describes the categories of information that Veera Healthcare Consultancy and its subsidiaries and affiliates (collectively, "RightClaim," "we," "us," or "our") collect from visitors to and users of the <a href="www.righttoclaims.com">www.righttoclaims.com</a> websites (each, a "Site"). This Privacy Policy also explains how RIGHTCLAIM can use, disclose, or share and protects such information, as well as your choices regarding it. The information we collect and the purposes for which we use or disclose or share it will depend to some extent on how you use a Site and how you interact with us. Throughout this Privacy Policy, "information" includes personal information about you.

PLEASE READ THIS PRIVACY POLICY AND THE TERMS OF USE (THE "TERMS") CAREFULLY. IF YOU DO NOT AGREE WITH THE PROVISIONS OF THIS PRIVACY POLICY OR THE TERMS, DO NOT USE OR VISIT A SITE. BY USING OR VISITING A SITE, YOU AGREE TO THE PROVISIONS OF THIS PRIVACY POLICY AND THE TERMS.

This Privacy Policy is organized as follows.

#### 1. What Information Do We Collect and How Do We Collect It?

We collect the following categories of information in the manner described below. We also can collect information about you through other individuals or our service providers, third parties, and/or other parties in the manner described below.

a. We collect information from or about you when you visit or use a Site.

Examples of ways in which you can visit or use a Site are

- to create, use, or make changes (for example, corrections, updates, or deletions) to your registered account with us (for example, to provide email address and password and any other information you provide, such as content);
- to provide contact information (for example, your name, email address, telephone number, postal address, job title, and employer's name) for transactions with us and/or a service provider, third party, and/or other party through a Site; information provided to us and/or a service provider, third party, and/or other party in connection with products and services (for example, for registration for, admission to, and/or attendance at courses, conferences, or webinars, including photographs (including your image and/or likeness and/or your voice)); payment card information; demographic information (for example, gender or zip code); and
- information when you contact or otherwise interact with us or a service provider and/or other party (for example, your search queries on a Site, asking questions or requesting information and materials, providing comments or suggestions, participating in surveys and evaluations, using interactive tools or features, signing up for email newsletters, and reporting an issue with a Site). If you elect to provide such user-generated content, then such user-generated content may be publicly available for others to view.
- b. We can receive information about you through other individuals or our service providers, third parties, and/or other parties (for example, social networking services), which information can be used as described in this Privacy Policy.
- c. We can automatically collect other information from or about you, including
  - operating system,
  - browser type,
  - o internet protocol (IP) address,
  - o platform type,
  - O software and hardware attributes,
  - O domain name of your internet service provider,
  - your geographic location,
  - o information regarding your access to and use of a Site, and
  - anonymized information.

In addition, we can automatically collect information about content viewed or downloaded, landing pages, browsing activity, dates and times of access, pages viewed, forms you complete or partially complete, search terms, whether you open an email and your interaction with email content, error logs, and other similar information.

We, along with our service providers, third parties, and/or other parties, can automatically collect such information via cookies, web beacons, tags, application analytics software, and other technologies. Please see ( Cookies and other technologies; Do Not Tract") below.

- d. We also can draw inferences about you based on information we collect from or about you. For example, based on your browsing or consulting activities, we may infer your consulting preferences and/or your interest in receiving certain communications from us.
- e. We can collect information about you from



- social networking services;
- publicly accessible sources;
- our subsidiaries and/or affiliates;
- o other individuals; and
- our service providers, third parties, and/or other parties.
- f. We can combine any of the information we collect from or about you and use it and disclose or share it in the manner described in this Privacy Policy.

#### 2. Cookies and Other Technologies; Do Not Track

We, along with our service providers, third parties, and/or other parties, use cookies, web beacons, tags, local shared objects, application analytics software, and other technologies. These technologies are used for tracking, advertising, analytics, and personalization and optimization of a Site.

- a. Cookies. Cookies are small text files that are stored on your computer.
  - O Persistent cookies remain on the visitor's or user's computer after the browser has been closed.
  - O Session cookies exist only during a visitor's or user's online session and disappear from the visitor's or user's computer when they close the browser software.

You can instruct your browser to stop accepting cookies. But if you do not accept cookies, you may not be able to use all portions or all functionality of a Site. Please see <a href="https://www.allaboutcookies.org/">https://www.allaboutcookies.org/</a> for additional information about cookies.

- b. Web beacons. Web beacons or tags (small images embedded into websites or emails that send information about your computer when you visit a Site or open an email we send to you) can be used by either us or a service provider, third party, and/or other party.
- c. Service providers, third parties, and/or other parties may collect personally identifiable information about an individual user's online activities over time and across different internet services when a user uses a Site.
- d. Below are links to resources regarding online tracking and targeting.
  - For Acuity Scheduling/Squarespace, please see https://www.squarespace.com/privacy, https://www.squarespace.com/terms-of-service, and https://support.squarespace.com/hc/en-us/articles/360001264507#toc-disable-analytics-and-performance.
  - For AdButler, please see https://adbutler.com/agreements.spark, including https://adbutler.com/agreements.spark?agreement=privacy and https://www.adbutler.com/cookie-opt-out.spark.
  - O For AddThis, please see https://www.oracle.com/legal/privacy/addthis-privacy-policy.html, https://www.addthis.com/privacy/terms-of-service/, and https://datacloudoptout.oracle.com/.
  - For Facebook, please
     see https://www.facebook.com/about/basics/advertising, https://www.facebook.com/about/privacy, https://www.facebook.com/legal/terms, https://facebook.com/policies/cookies, https://www.facebook.com/help/568137493302217, and https://www.facebook.com/legal/terms/state-specific.
  - O For Google Analytics, Google Optimize, and Google Tag Manager, please see https://policies.google.com/privacy, https://policies.google.com/terms, https://policies.google.com/techn ologies/partnersites, https://www.google.com/analytics/terms/, https://marketingplatform.google.com/about/analytics/tagmanager/use-policy/, and https://tools.google.com/dlpage/gaoptout.
  - O For LinkedIn, please see https://www.linkedin.com/legal/privacy-policy, https://www.linkedin.com/legal/user-agreement, and https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out.
  - O For Mailchimp, please see https://mailchimp.com/legal/privacy/, https://mailchimp.com/legal/terms/, https://mailchimp.com/legal/cookies/, and https://mailchimp.com/dsar-requests/.
  - O For Podbean, please see https://www.podbean.com/privacy and https://www.podbean.com/podbean-terms.
  - For Twitter, please see https://twitter.com/en/privacy, https://twitter.com/en/tos, and https://help.twitter.com/en/personalization-data-settings.
  - O For WisePops, please see https://support.wisepops.com and https://wisepops.com/terms-of-service.
  - O For Wistia, please see https://wistia.com/privacy and https://wistia.com/terms.
  - O For YouTube, please see https://policies.google.com/privacy and https://www.youtube.com/t/terms.

Some advertising provided from RightClaim may be contextual (for example, using AdButler or WisePops). Contextual ads are ads shown to you based on the context of a website that you are visiting. You should also know that we may still collect information from your computer and use it for other purposes like evaluating how a Site works for research or detecting and preventing fraud or misuse of our products and services.

e. Ad networks. We use service providers, third parties, and/or other parties, such as network advertisers, to serve advertisements on other websites or other media (for example, a social networking service). This enables us and these service providers, third parties, and/or other parties to target advertisements to you for products offered by us and



products and services offered by service providers, third parties, and/or other parties in which you might be interested. Ad network providers, advertisers, sponsors, and/or traffic measurement services may use cookies, JavaScript, web beacons, and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These cookies and other technologies are governed by each service provider's, third party's, and/or other party's specific privacy policy, not this Privacy Policy.

Users in the India may opt out of many ad networks. For example, you may go to the Digital Advertising Alliance ("DAA") Consumer Choice Page at http://optout.aboutads.info for information about opting out of interest-based advertising and choices regarding having information used by DAA companies at http://digitaladvertisingalliance.org/participating. You may also go to the Network Advertising Initiative ("NAI") Consumer Opt-Out Page

at http://optout.networkadvertising.org for information about opting out of interest-based advertising and choices regarding having information used by service providers, third parties, and/or other parties that are NAI members at https://www.networkadvertising.org/participating-networks.

Opting out from one or more companies listed on the DAA Consumer Choice Page at http://optout.aboutads.info or the NAI Consumer Opt-Out Page at http://optout.networkadvertising.org will remove you from those companies' delivery of interest-based content or ads to you, but it does not mean you will no longer receive any advertising through a Site or on other websites. Even if you opt out from one or more companies listed on the DAA Consumer Choice Page or the NAI Consumer Opt-Out Page, you may continue to receive advertisements, for example, based on the particular website that you are viewing (i.e., contextually based ads). Also, if your browsers are configured to reject cookies when you opt out on the DAA or NAI websites, your opt-out may not be effective. Additional information is available on the DAA's website at https://youradchoices.com/ or the NAI's website at https://www.networkadvertising.org.

f. Do not track. At this time, we do not respond to "Do Not Track" signals sent from web browsers or other mechanisms that provide users the ability to exercise choice regarding the collection of personally identifiable information about a user's online activities over time and across service provider, third party, and/or other party internet services.

#### 3. How We Use the Information We Collect

We can use the information that we collect from and about you to conduct our business and for any of the purposes described in the Privacy Policy, subject to applicable law. Examples are as follows.

- a. To provide you with products and services. To provide or facilitate providing you with products and services (for example, subscriptions and in connection with courses, conferences, or webinars, including as described in "with whom do we disclose or share your information?" below), such as to fulfil your transactions and process your payments and process, maintain, and service your registered account or accounts.
- b. To administer and troubleshoot a site.
- c. To communicate with you. To communicate with you to provide information, notifications, promotions, and recommendations, including, without limitation, based on information you provide, from us or our subsidiaries and/or affiliates.
- d. To respond to you. To respond to you, such as when you place an order or make a transaction, contact us, make a request or inquiry, complete a survey or evaluation, or share a comment or suggestion.
- e. For personalization of your experiences with us. For personalization of your experiences with us, including to remember your interests and preferences, customize the products and services we share with you, facilitate your interactions with us, track and categorize your activity and interests on a Site, and enrich your experience on a Site.
- f. For marketing and advertising. For marketing and advertising, such as to send you marketing and advertising communications, and to customize the marketing and advertising that we show you. We can also run advertising on other websites and applications via our advertising display partners.
- g. For analytics. For analytics, including to understand how you use a Site, determine how you access a Site, and improve a Site, by us or a service provider, third party, and/or other party, subject to applicable law.
- h. For our business purposes. For our business purposes, such as to operate and improve upon our business and lawful business activities; to maintain our accounts and records, research, product, service, and content improvement and development; to determine your satisfaction with our products and services; to detect and prevent fraud or misuse of our products and services; and for any other business purpose that is permitted by applicable law.
- i. Surveys and evaluations; research. To create and/or administer surveys and evaluations and conduct research.
- j. For legal and safety purposes. For legal and safety purposes, including to defend or protect us, you, or others, from harm or in legal proceedings; protect our rights; protect our security and the security of others and property; respond to court orders, lawsuits, subpoenas, and government requests; address legal and regulatory compliance; enforce the Terms; and notify you of safety issues.
- k. Anonymized information. For collecting, compiling, and/or creating anonymized information, which we or a service provider, third party, and/or other party can do, subject to applicable law, and which we or a service provider, third party, and/or other party can use for any purpose, subject to applicable law.
- 1. With your consent. We can use your information other than as described in this Privacy Policy if we notify you and you consent to such use.
- m. At your request. We can use your information at your request, subject to applicable law.
- n. For any other purpose with notice by us. We can use your information for any other purpose for which we provide you with notice, subject to applicable law.
- o. Cookies and other technologies; do not track. Please see "Cookies and other Technologies; Do Not Track" above.



### 4. With Whom Do We Disclose or Share Your Information?

Information can be disclosed to or shared with service providers, third parties, and/or other parties in accordance with this Privacy Policy, subject to applicable law. Please note that a user can choose not to disclose or share certain information. Please se e" what information Do We Collect and How Do We Collect It?", see "Cookies and other Technologies; Do Not Track" and "How WE Use the Information we Collect" above and "Children's Privacy" "Storage", "Retention, "Choices Regarding Your Information—Social Networking Service" and "Your India Privacy Rights" below.

- a. Service providers, third parties, and/or other parties. We can use service providers, third parties, and/or other parties to perform certain services on our behalf, including, without limitation, payment processing, monitoring compliance by users with and enforcement of and applying the Terms, auditing interactions and transactions with you, detecting and preventing fraud, addressing security issues, fixing errors, helping us with advertising or marketing, maintaining accounts and providing customer success, helping with our internal research, verifying product and service quality, and performing any of the other actions or activities allowed under this Privacy Policy. We can disclose or share information about you that they need to perform their functions and in accordance with our agreements with them.
- b. Sponsors and exhibitors. If you choose to register for a course, conference, or webinar, your information, namely your name, postal address, email address, job title, and employer's name, may be disclosed to or shared with certain sponsors and exhibitors in connection with such course, conference, or webinar.
- c. Regulators and accreditation authorities or agencies. If you choose to use attendance at a course, conference, or webinar for continuing education credit for a license, certification, or similar program, we can disclose or share your information with service providers, third parties, and/or other parties, including regulators and accreditation authorities or agencies.
- d. Social networking service. If you choose to use a social networking service, information from or about you may be disclosed to, shared with, or collected by the social networking service. Please see "Choices Regarding Your Information Social Networking Service" below.
- e. Subsidiaries and affiliates. We can also disclose or share your information with any subsidiary or affiliate of ours for purposes consistent with this Privacy Policy. Any subsidiary or affiliate of ours will be required to main tain that information in accordance with this Privacy Policy.
- f. Direct marketing. We can disclose or share personal information with third parties for such third parties' direct marketing purposes. Please see "Your India Privacy Rights" below.
- g. Business changes. If we become involved in or engage in the preparatory steps leading to a merger, acquisition, sale of assets, divestiture, joint venture, securities offering, financing, bankruptcy, reorganization, liquidation, dissolution, or other transaction or if the ownership of all or substantially all of our business otherwise changes, we can disclose, share, or transfer your information to another party or other parties, and it can be used subsequently by such party or parties.
- h. For analytics. For analytics, including to understand how you use a Site, determine how you access a Site, and improve a Site, by us or a service provider, third party, and/or other party, subject to applicable law.
- i. Legal and safety. Other parties such as law enforcement, government entities, courts, or service providers, third parties, or other parties as required or allowed by applicable law and/or to enforce or apply the Terms, such as for the legal and safety purposes described in "How we use the information we collect "above, or otherwise to help prevent harm or fraud to us, you, or others.
- j. Anonymized information. We can disclose or share anonymized information relating to visitors to and users of a Site with any service provider, third party, and/or other party for any purpose, subject to applicable law.
- k. With your consent. We can disclose or share your information other than as described in this Privacy Policy if we notify you and you consent to this disclosure or sharing.
- l. At your request. We can disclose or share your information with any other individual or service provider, third party, and/or other party at your request, subject to applicable law.
- m. For any other purpose with notice by us. We can disclose or share your information for any other purpose for which we provide you with notice, subject to applicable law.
- n. Cookies and other technologies; do not track. Please see "Cookies and other Technologies; Do Not Tract" above.

# 5. Links to Other Websites

This Privacy Policy applies only to a Site. The Site may have links to other websites to which this Privacy Policy does not apply. The links from the Site do not imply that we endorse or have reviewed these websites. The policies and procedures we describe here do not apply to these websites. We neither can control nor are responsible for the privacy practices or content of these websites. We suggest reviewing the privacy policies of these websites.

### 6. Children's Privacy

We do not knowingly collect personal information from individuals under age eighteen (18). If you are under the age of eighteen (18), please do not access, use, or submit any personal information through a Site. If you have reason to believe that we may have accidentally received personal information from an individual under age eighteen (18), please Contact Us immediately.

### 7. How We Protect Your Information

We take physical, technological, and administrative measures to protect the information that you provide through a Site from accidental or unlawful destruction, loss, or alteration and from unauthorized access, use, or disclosure. Please be aware, however, that



no security measures can guarantee absolute security. No internet or electronic transmission or method of electronic storage is ever fully secure or error free. Internet or electronic communications, including those sent through a Site, may not be secure. You should use caution whenever submitting information through a Site and take special care in deciding which information with which you provide us.

To further protect yourself, you should safeguard your password and not share it with anyone. You should also sign off your registered account and close your browser window when you have finished your visit to a Site.

#### 8. Storage

Your personal information is stored on servers in various locations, including the India. Your personal information may be disclosed in response to inquiries or requests from government authorities in the countries in which we operate Indian federal and state governments, courts or law enforcement, or regulatory agencies may be able to obtain disclosure of your information through laws applicable in the India. By using a Site, you understand that your information can be transferred to countries outside of your country of residence, including the India, which may have data protection rules that are different from those of your country.

#### 9. Retention

RightClaim will retain your personal information for as long as reasonably necessary for the purposes outlined in this Privacy Policy, while we have a legitimate business need to do so in connection with your registered account, or as required by law (for example, for legal, tax, accounting, or other purposes), whichever is the longer.

If you have elected to receive email communications from us, we retain information about your email preferences until you opt out of receiving these email communications and in accordance with our policies.

To determine the appropriate retention period for your personal information, we will consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. In certain circumstances, we can anonymize your personal information, subject to applicable law.

### 10. Choices Regarding Your Information

You have choices regarding your information on a Site.

- a. Changing your information. You can make changes to your information, including accessing your information, correcting or updating your information, or deleting your information by signing in to your registered account or via Contact Us or via postal mail as described in "How to Contact us" below, subject to applicable legal restrictions. We may take reasonable steps to verify your identity before providing access to, correction of, update of, or deletion of your personal information.
- b. Email communications. You can make changes regarding receiving newsletters or promotional communications by email from us by clicking the "unsubscribe" link in the body of such email. You may also Contact Us at any time to opt out of receiving newsletters or promotional communications by email from us.
- c. Postal mail. We can send you promotional communications via postal mail. If you wish to opt out of promotional communications sent via postal mail, please Contact Us or contact us via postal mail as described in "How to Contact us" below
- d. Withdrawing consent. You can withdraw your consent to our use, disclosure, or sharing of your information at any time via Contact Us or via postal mail as described in "How to Contact us" below.
- e. Sponsors and exhibitors. You may opt out to the disclosure or sharing of your name, postal address, email ad dress, job title, and employer's name with sponsors and exhibitors in connection with registration for a course, conference, or webinar via Contact Us and, for natural persons who are California residents, you may also opt out to such disclosure or sharing as outlined on the following page: Do Not Sell My Personal Information. (Please see "Your Indian Privacy Rights" below for additional information.)
- f. Cookies and other technologies; do not track. Please see "Cookies and other Technologies; Do Not Tract" above.
- g. Social networking service. You should make sure you are comfortable with what information from or about you may be disclosed to, shared with, or collected by a social networking service. For what information is disclosed, shared, or collected and how it is used, please carefully review the social networking service's privacy policy and terms and conditions and modify your privacy settings directly on that service.
- h. Please see "Retention" above.
- i. Please see "Your Indian Privacy Rights" below.

### 11. How To Contact Us

If you have any questions or comments about this Privacy Policy, please contact us via Contact Us or at the following postal address or contact details.

Right Claim

Vraj, Mansi.Co.Op. Hos.Soc, Sattadhar, Ahmedabad, Gujarat, India.

Email: care@Righttoclaims.com



### 12. Your Indian Privacy Rights

Please see Your California Privacy Rights Notice for natural persons who are Indian residents. (See Indian Privacy Rights)

### 13. Changes to this Privacy Policy

We reserve the right to update or modify this Privacy Policy at any time and from time to time. When we post changes to this Privacy Policy, we will revise the "LAST UPDATED" date at the top of this Privacy Policy, and any changes will be effective upon posting of the revised version of this Privacy Policy. Please review this Privacy Policy periodically and especially before you provide any information

### Change To Privacy Policy

- The Users acknowledge that this privacy policy is part of the terms of use, and unconditionally agree that becoming a User signifies their assent to this privacy policy. User's visit and any dispute over privacy is subject to this policy and terms of use. RightClaim may update this privacy policy at any time, with or without advance notice. If there are significant changes in the way RightClaim treats User's personally identifiable information, a notice will be displayed on the Platform, or RightClaim may send Users an email, as provided for above. Unless stated otherwise, this current privacy policy applies to all information that RightClaim has about Users.
- If a User uses the Service after notice of changes have been sent to such User or published on the Platform, such User hereby provides his/her/its consent to the changed practices.

#### Your India Privacy Rights Notice

### Effective Date and Last Revised: February 25, 2021

Your India Privacy Rights Notice ("Notice") supplements the information contained in the Privacy Policy of Veera Healthcare Consultancy and its subsidiaries and affiliates (collectively, "RightClaim," "we," "us," or "our") and applies in certain circumstances solely to all natural persons who are California residents ("consumers" or "you").

### 1. India Consumer Privacy Act Notice

The India Consumer Privacy Act defines "personal information" broadly as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. This India Consumer Privacy Act Notice also uses that definition for personal information.

# a. Categories and Sources of Personal Information We Collect $\,$

Please see What Information Do We Collect and How Do We Collect It?" and "Cookies and other Technologies; Do Not Tract" in our Privacy Policy to understand the categories of personal information we collect from or about you and the categories of sources from which we obtain personal information.

Please see What Information Do We Collect and How Do We Collect It?" and "Cookies and other Technologies; Do Not Tract" in our Privacy Policy to understand the categories of personal information we have collected from or about consumers in the preceding twelve (12) months and the categories of sources from which we have obtained personal information in the preceding twelve (12) months.

### b. Our Collecting, Using, and Disclosing or Sharing Personal Information

We disclose or share personal information from or about you with our service providers, third parties, and/or other parties for business purposes, such as operational purposes and other purposes related to providing you with the products and services you seek from us. We provide more information about the business purposes or commercial purposes for which we disclose or share person al information in "What Information Do We Collect" and "Cookies and other Technologies; Do Not Tract" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy. We may disclose or share any of the categories of personal information listed in in What Information Do We Collect and How Do We Collect It?" and "Cookies and other Technologies; Do Not Tract How Do We Collect It?" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy for business purposes or commercial purposes.



Please see How Do We Collect It?" "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy to understand the business purposes or commercial purposes for which we have collected personal information in the preceding twelve (12) months.

We have disclosed or shared personal information for business purposes in the preceding twelve (12) months as described How Do We Collect It?" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy. Any of the categories of personal information listed in "What Information Do We Collect" and "Cookies and other Technologies; Do Not Tract, "How We Use the Information We Collect" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy may have been disclosed or shared for business purposes in the preceding twelve (12) months.

We may disclose or share personal information from or about you with the categories of third parties as described in "How We Use the Information We Collect" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy. We may disclose or share any of the categories of personal information listed in "What Information Do We Collect" and "Cookies and other Technologies, Do Not Tract, "How We Use the Information We Collect" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy.

Please see "How We Use the Information We Collect" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy to understand the categories of third parties with whom we have disclosed or shared personal information in the preceding twelve (12) months.

We disclose or share personal information with our service providers, third parties, and/or other parties, including with certain sponsors and exhibitors in connection with registration for a course, conference, or webinar and to help us market or advertise to you. Please see "What Information Do We Collect" and "Cookies and other Technologies; Do Not Tract and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy.

California law may characterize our disclosing or sharing of the following categories of personal information as a sale of personal information (including in the preceding twelve (12) months)

- with certain sponsors and exhibitors in connection with registration for a course, conference, or webinar: identifiers such as full name, postal address, email address, job title, and employer's name; and
- with online advertising service providers, third parties, and/or other parties to help us market or advertise to you
  identifiers such as email address, online activity such as internet or other electronic network activity information, including
  but not limited to, browsing activity, search queries, search terms, and information regarding your interaction with
  websites, applications, or advertisements, and inferences about any of the information above that may relate to your
  preferences or other matters.

Please see "What Information Do We Collect" and "Cookies and other Technologies; Do Not Tract' & "How We Use the Information We Collect" and "With Whom Do We Disclose or Share Your Information?" in our Privacy Policy to understand the commercial purposes for which we may have sold personal information under California law in the preceding twelve (12) months.

We do not knowingly collect or sell the personal information of consumers under sixteen (16) years of age.

c. Your Rights and Choices

# Your Rights To Know

You have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale of your personal information in the preceding twelve (12) months. Once we receive and confirm your request to know, we will disclose the following to you.

- The categories of personal information we collected about you
- $\bullet\hspace{0.4cm}$  The categories of sources for the personal information we collected about you
- Our business purpose or commercial purpose for collecting or selling that personal information
- $\bullet \qquad \text{The categories of third parties with whom we share that personal information} \\$
- The specific pieces of personal information we collected about you (also called a request to know data portability request)
- If we sold or disclosed or shared your personal information for a business purpose, two separate lists disclosing
  - sales, identifying the personal information categories that each category of recipient purchased, including categories of third parties, and disclosures or sharing for a business purpose, identifying the personal information categories that each category of recipient obtained, including categories of third parties

# **Your Deletion Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, in certain circumstances. Once we receive and confirm your request to delete, we will delete from our records and direct our service providers to delete from their records your personal information, in certain circumstances.



### Exercising Requests To Know and Requests To Delete

To exercise the request to know and request to delete rights described above, please submit a verifiable consumer request to us via Contact Us. Only you or a person registered with the Indian Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information.

A verifiable consumer request must

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

You may only make a request to know twice within a twelve (12)-month period.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm that the personal information relates to you.

We will use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

# Response Timing and Format

We endeavor to respond to requests to know and requests to delete within forty-five (45) calendar days. If we require more time (up to an additional forty-five (45) calendar days), we will provide you with notice and an explanation of the reason that we will take more than forty-five (45) calendar days to respond to the request.

We will deliver our written response via postal mail or via email, at your option.

The response we provide will also explain the reasons we cannot comply with a verifiable consumer request (including regarding a request to delete, whether we have complied with that request), if applicable.

Any disclosures we provide will only cover the twelve (12)-month period from the date that we receive the request to know.

For request to know data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, including via email.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

### Your Rights to Opt out and Opt in

You have the right, at any time, to request that we not sell your personal information to third parties ("request to opt out"). Consumers who request to opt in to personal information sales may request to opt out of future sales at any time.

To exercise the request to opt out right described above, you (or your authorized agent) may submit a request to opt out to us vi a Contact Us or as outlined on the following page: Do Not Sell My Personal Information".

We will comply with a request to opt out as soon as feasibly possible and no later than fifteen (15) business days from the date we receive the request.

Once you make a request to opt out, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and request to opt in to personal information sales at any time via Contact Us.

We will use personal information provided in a request to opt out to review and comply with the request.

 $Please \ also see \ \underline{https://www.privacyrights.info/} \ or \ \underline{https://optout.privacyrights.info} \ with \ respect to \ service \ providers, third \ parties, and/or other parties regarding online tracking and targeting and that participate in the opt-out tool.$ 

### Non discrimination

You have the right not to receive discriminatory treatment by us for the exercise of the privacy rights conferred by the CCPA. Unless permitted by the CCPA, we will not

- deny you for services;
- charge you different prices or rates for services, including through granting discounts or other benefits or imposing penalties;
- provide you a different level or quality of goods or services; or
- suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.



### 2. Additional Rights under India Law

Indian Civil Law permits individuals who are Indai residents to request from a business, with which the India residents have an established business relationship, certain information about the categories of personal information the business has shared with third parties for those third parties' direct marketing purposes and the names and addresses of the third parties with whom the business has shared such information during the immediately preceding calendar year. You can make one request each year by writing to us at the following postal address.

Right Claim

Attention: Customer Service Department

Email: care@righttoclaims.com

You must include the following in your writing.

- The statement "Your California Privacy Rights"
- Your name, postal address, city, state, and zip code

You also may include your email address in your writing.

We will respond to you at your postal address or, at our option, your email address if you provided your email address in your writing,

# 3. Contact Information

If you have questions about our Privacy Policies, Notices, or privacy practices, please contact us using the contact information noted in "How To Contact Us" in our Privacy Policy.

### 4. Notice Update

We reserve the right to update or modify this Notice, including without limitation, the Indian Consumer Privacy Act Notice, at any time and from time to time. Please review this Notice periodically and especially before you provide any information or data. This Notice was made effective on the date indicated above.