

**EX CURIA**  
**INTERNATIONAL**  
**GENERAL**  
**PRIVACY POLICY**

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## 1. INTRODUCTION

Thank you for choosing to be part of our community at EX CURIA INTERNATIONAL (hereinafter “**ECI**” or “**Us**” or “**We**” our “**Our**”). ECI is committed to protect your personal information and your right to privacy.

In case you have any questions or concerns about ECI’s policy or practices regarding your personal information, you may write in to Us at **official@excuriainternational.com**.

When you visit ECI’s website [www.excuriainternational.com] (“**Website**”) and use its services, you trust Us with your personal information.

This privacy notice is described as ECI’s privacy policy. The purpose of this privacy policy is to provide you with the particulars of the information that ECI may collect, the manner in which such information may be used by ECI, and your rights in relation to your information. If there are any terms in this privacy policy that you do not agree with, please discontinue the use of ECI’s website and services.

This privacy policy applies to all information collected through ECI’s websites (such as www.excuriainternational.com), [our email addresses] [or] [our social media applications] and/or any related services, sales, marketing or events (We refer to them collectively in this privacy policy as the “**Sites**”).

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with Us.**

## 2. THE NATURE OF INFORMATION COLLECTED BY EX CURIA INTERNATIONAL

### 1) The personal information you disclose to ECI

*Summary: We collect personal information that you provide to us, such as name, address, contact information and passwords.*

ECI collects personal information that you voluntarily provide to Us when [registering at the Sites or Apps], expressing an interest in obtaining information about ECI when participating in activities on the Sites [(such as posting messages on our online forums or entering competitions, contests or giveaways)] or otherwise contacting us.

The personal information that ECI collects depends on the context of your interactions with ECI and the Sites, the choices you make. The personal information ECI collects can include the following:

**Name and Contact Data.** ECI collects your first and last name, email address, postal address, phone number.

All personal information that you provide to ECI must be true, complete, and accurate, and you must notify ECI of any changes to such personal information.

### ***Information automatically collected***

***Summary:*** *Some information – such as IP address and/or browser and device characteristics is collected automatically when you visit our websites.*

ECI automatically collects certain information when you visit, use, or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser, device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information of this nature. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

### ***Information collected from other Sources***

***Summary:** ECI may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

ECI may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), and other third parties. Examples of the information ECI receives from other sources include; social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads, search results and links, including paid listings (such as sponsored links).

## **2) HOW WILL ECI USE YOUR INFORMATION?**

***Summary:** ECI processes your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.*

ECI uses personal information collected via its Sites for a variety of business purposes described below. ECI processes your personal information for these purposes in relation to our legitimate business interests ("**Business Purposes**"), in order to enter into or perform a contract with you ("**Contractual**"), with your consent ("**Consent**"), and/or for compliance with our legal obligations ("**Legal Reasons**"). ECI indicates the specific processing grounds it relies on next to each Business Purpose listed below:

**[for verification purposes, for protection of users]**

- **To facilitate account creation and logon process** with your Consent. If you choose to link your account with us to a third-party account \*(such as your Google or Facebook account), ECI uses the information you allowed those third parties to collect, to facilitate account creation and logon process. See the section below headed "Social Logins" for further information.

- **To send you marketing and promotional communications** for Business Purposes and/or with your Consent. ECI and/or its third party marketing partners may use the personal information you send to ECI for its marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of ECI marketing emails at any time (see the "Your Privacy Rights" below).
- **To communicate relevant administrative information to you** for Business Purposes, Legal Reasons and/or possibly Contractual. ECI may use your personal information to send you product related, service related, and new feature related information and/or information about changes to ECI terms, conditions, and policies. You can opt-out of ECI administrative emails at any time (see the "Your Privacy Rights" below).
- **Administer prize draws and competitions** for ECI Business Purposes and/or with your Consent. ECI may use your information to administer prize draws and competitions when you elect to participate in competitions.
- **Request Feedback** for ECI Business Purposes and/or with your Consent. ECI may use your information to request feedback and to contact you about your use of the Sites.
- **To protect ECI Sites** for Business Purposes and/or Legal Reasons. ECI may use your information as part of its efforts to keep ECI Sites safe and secure (for example, for fraud monitoring and prevention).
- **To enable user-to-user communications** with your Consent. ECI may use your information in order to enable user-to-user communications with each user's consent.
- **To enforce ECI terms, conditions and policies** for Business Purposes, Legal Reasons and/or possibly Contractual.
- **To respond to legal requests and prevent harm** for Legal Reasons. If ECI receives a subpoena or other legal request, ECI may need to inspect the data we hold to determine how to respond.

### 3) **WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

*Summary: ECI only shares information with your consent, to comply with laws, to protect your rights, or to fulfil business obligations.*

ECI only shares and discloses your information in the following situations:

- **Compliance with Laws.** ECI may disclose your information where it is legally required to do so in order to comply with applicable laws, governmental requests, a judicial proceeding, a court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** ECI may disclose your information where it believe it is necessary to investigate, prevent, or take action regarding: (a) potential violations of its policies; (b) suspected fraud; (c) situations involving potential threats to the safety of any person; (d) illegal activities; or (e) as evidence in ECI-related litigation.
- **Vendors, Consultants and Other Third-Party Service Providers.** ECI may share your data with third party vendors, service providers, contractors or agents who perform services for us or on ECI's behalf and require access to such information to fulfil their obligations. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. ECI may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this policy, ECI does not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** ECI may share or transfer your information in connection with, or during negotiations of, any merger, sale of assets, financing, or acquisition of all or a portion of ECI business to another company.



- **Third-Party Advertisers.** ECI may use third-party advertising companies to serve ads when you visit the Sites. These companies may use information about your visits to the ECI website and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.
- **Business Partners.** *ECI may share your information with its business partners to offer you certain products, services or promotions.*
- **With your Consent.** *ECI may disclose your user information to any other person with your consent.*
- **Other Users.** *When you share personal information (for example, by posting comments, contributions or other content to the Sites) or otherwise interact with public areas of the Site [or App], such personal information may be viewed by all users and may be publicly distributed outside the Site [and our App] in perpetuity. [If you interact with other users of our Sites and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity.] Similarly, other users will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.*

#### **4) DOES ECI USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

***In Short:*** *ECI may use cookies and other tracking technologies to collect and store your information.*

ECI may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

#### **1. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

***In Short:*** ECI may transfer, store, and process your information in countries other than your own.

ECI servers are located in India. If you are accessing ECI Sites from outside India, please be aware that your information may be transferred to, stored, and processed by us in ECI facilities and by those third parties with whom ECI may share your personal information (see "**Disclosure of Your Information**" above).

## **2. WHAT IS ECI STANCE ON THIRD-PARTY WEBSITES?**

***In Short:*** ECI is not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.

The Sites may contain advertisements from third parties that are not affiliated with ECI and which may link to other websites, online services or mobile applications. ECI cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. ECI is not responsible for the content, or the privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You are requested to review the policies of such third parties and contact them directly, in case of queries.

## **3. HOW LONG DOES ECI KEEP YOUR INFORMATION?**

***In Short:*** ECI keeps your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

ECI will only keep your personal information for 30 days for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When ECI has no ongoing legitimate business need to process your personal information, ECI will either delete or anonymize it, or, if this is not possible (for example, because your

personal information has been stored in backup archives), then ECI will securely store your personal information and isolate it from any further processing, until deletion is possible.

#### **4. HOW DOES ECI KEEP YOUR INFORMATION SAFE?**

*In Short: ECI aims to protect your personal information through a system of organizational and technical security measures.*

ECI has implemented appropriate technical and organizational security measures designed to protect the security of any personal information it processes. However, please also note that ECI cannot guarantee that the internet itself is entirely secure. Although ECI will do its best to protect your personal information, transmission of personal information to and from ECI's Sites is at your own risk. You should only access the services within a secure internet environment.

#### **5) DOES ECI COLLECT INFORMATION FROM MINORS?**

*In Short: ECI does not knowingly collect data from or market to children under 18 years of age.*

ECI does not knowingly solicit data from or market to children under 18 years of age. By using the Sites, you represent that you are at least 13 years of age as on the date of using the Site, or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site [and App]. If ECI learns that personal information from users less than 18 years of age has been collected, ECI will deactivate the account and take reasonable measures to promptly delete such data from its records. If you become aware of any data ECI has collected from individuals under the age of 13, please contact us at [official@excuriainternational.com](mailto:official@excuriainternational.com).

#### **6) WHAT ARE YOUR PRIVACY RIGHTS?**

**Summary:** *In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information; (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below [official@excuriainternational.com](mailto:official@excuriainternational.com). ECI will consider and act upon any request in accordance with the applicable data protection laws in your region.

If ECI is relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

## **1. Account Information**

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account;
- Contacting us using the contact information provided below; and
- [Other]

Upon your request to terminate your account, ECI will deactivate or delete your account and information from our active databases. However, some information may be retained in ECI's files to prevent fraud, troubleshoot problems, assist with any investigations, enforce ECI's 'Terms of Use' Policy and/or comply with legal requirements.

## **2. Cookies and similar technologies:**

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to change your browser settings to remove cookies and/or to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of ECI's Sites. To opt-out of interest-based advertising by advertisers on ECI's Site, visit <http://www.aboutads.info/choices/>.

### **3. Opting out of email marketing:**

You can unsubscribe from ECI's marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below (Section 7.3). You will then be removed from the marketing email list. However, ECI will still need to send you service-related emails that are necessary for the administration and use of your account. You can also choose to opt-out of this by:

- Indicating your preferences at the time you register your account with the Sites;
- Logging into your account settings and updating your preferences; and
- Contacting us using the contact information provided below.

## **7) DOES ECI MAKE UPDATES TO THIS POLICY?**

*Summary: Yes, ECI will update this policy as necessary to stay compliant with relevant laws.*

ECI may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. ECI reserves the right to make changes to this policy at any time and for any reason. Any changes or modifications will be effective immediately upon posting the updated policy on ECI's Website. You waive the right to receive specific notice of each such change or modification. ECI encourages you to review this privacy policy frequently to be informed of how ECI is protecting your information.

## **8) HOW CAN YOU CONTACT ECI ABOUT THIS POLICY?**

If you have questions or comments about this policy, email ECI at [official@excuriainternational.com](mailto:official@excuriainternational.com).

If you have any further questions or comments about ECI or our policies, email us at [official@excuriainternational.com](mailto:official@excuriainternational.com).