

PRIVACY POLICY

Last Updated: 1st April 2021

A. INTRODUCTION

Design For Use Consulting Pvt. Ltd. is licensed to operate the toffeeinsurance.com platform to sell and service insurance policies as a licensed corporate agent from the Insurance Regulator – Insurance Regulatory and Development Authority of India(IRDA).

Toffcover Core Technologies Pvt. Ltd. owns the technology platform represented by Toffee and its websites on the domain - <http://www.toffeeinsurance.com>.

Toffee platform simplifies the insurance buying and servicing process from multiple Insurance companies.

Toffee collects, uses, maintains, and discloses information collected from users (each, a "User") of the <http://www.toffeeinsurance.com> website ('Site'). This privacy policy applies to the Site and all products and services offered by Toffee.

B. DEFINITIONS

1. "Toffee" or "Company" or "Us" or "We" - refers to Design For Use Consulting Pvt. Ltd – a licensed Corporate Agent by IRDAI
2. "Insurance Policy" means insurance policy issued/ that may be issued by Toffee
3. "Privacy Policy" means to this Policy.
4. "You" or "User(s)" means the person(s) visiting/accessing the Website in any capacity.
5. "Website" – refers to www.toffeeinsurance.com website and additional Portals/Micro/Mini/Mobile sites that link to the main back end to create a distributed presence to fulfil the needs & functional requirements of all segments of customers.
6. "Services" – all services made available by Toffee through its Website.

7. "Personal Data or Information" means 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 or relating itself to such person and/or the property(s)/profession of a person and/or any other personal information of such person.

8. "Sensitive Personal Data or Information": Sensitive Personal Data or Information of a person means such personal Data or information which consists of information relating to:

(i) password;

(ii) financial information such as Bank account or credit card or debit card or other payment instrument details;

(iii) physical, physiological and mental health condition;

(iv) sexual history or orientation;

(v) medical records and history as to any type of ailments [including HIV/AIDS] and health status of insured and his/her family members;

(vi) Biometric information of person or employee;

(vii) any detail relating to the above clauses as provided to body corporate for providing service; and

(viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise:

Provided that any information that is freely and legally available or accessible in public domain or furnished under any statutory provisions for the time being in force shall not be regarded as sensitive Personal Data or Information for the purposes of this Privacy Policy

C. APPLICABILITY

This Privacy Policy is applicable to all users/visitors/viewers of the Website. This statement and the Policy outlined herein are not intended to and do not create any contractual or financial or any other legal rights in favour of any User or viewer or any other party.

Please read this Privacy Policy carefully. By using any of the Services, You represent that You have read and understood the terms and conditions of

usage, which includes this Privacy Policy, and You agree to be bound by all its terms.

D. USE/DISCLOSE OF YOUR PERSONAL INFORMATION AND SENSITIVE PERSONAL DATA OR INFORMATION

1. The Personal Information and Sensitive Personal Data or Information collected from you may be used by us for a number of lawful purposes connected with our business operations and functions, which include but are not limited to:

- (i) Verification of your identity as per prevalent laws and regulation;
- (ii) In the normal course of business to enforce the terms and conditions of products or services or Terms and Conditions
- (iii) Dealing with requests, enquiries or complaints and other customer care related activities and all other general administrative and business purposes;
- (iv) Customer analytics on usage pattern and delivering customized content and advertisements that may be relevant/of interest to you;
- (v) Address network integrity and security issues;
- (vi) Carrying out any activity in connection with a legal, governmental or regulatory requirement, for the purpose of compliance of a legal obligation, in connection with legal proceedings, in connection with prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, protect and defend our rights or property or act in an emergency to protect safety or to help investigations, monitor or prevent or take action regarding unlawful and illegal activities/suspected fraud/potential threat to the safety or security of any person;
- (vii) Carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer;
- (viii) Carrying out market and product analysis and marketing our companies' products and services and communicate updates, offers and promotion;

2. Disclosure of Personal Information and Sensitive Personal Data or Information

(i) The Company is authorised to and may share Personal Information and/or Sensitive Personal Data or Information for providing you with any of your subscribed services and any service-related activities such as collecting subscription fees from you for those services, and notifying or contacting you regarding any problem with, or the expiration of, such services.

(ii) Towards this objective, the Company may be required to disclose your relevant personal information to the Insurance Companies for issuance of insurance policy, one or more Agents, Affiliates and/or contractors of Toffee and their sub-contractors subject to necessary non-disclosure agreements.

(iii) You may inform us at any time not to share Your Personal Information with third parties by sending us an e-mail at hello@toffeeinsurance.com

E. COMMUNICATION

Toffee retains the right to communicate with You (via e-mail, postal service / courier or mobile messaging services/app). Toffee further retains its right to communicate through third party vendors. You shall have the option to unsubscribe to receive such email communication.

F. WEB COOKIES

Our Site uses "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 you do so, note that some parts of the Site may not function properly.

G. HOW WE PROTECT YOUR INFORMATION

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

Sensitive and private data exchange between the Site and its Users happens over a SSL secured communication channel and is encrypted and protected with digital signatures.

Our platform and data are hosted on encrypted and secured by the virtual private cloud of Amazon Web Services (AWS) network. The encryption strength conforms to the industry standard of 256-bit SSL. All the main servers are on a private subnet that is inaccessible publicly.

H. THIRD PARTY WEBSITES

Users may find content on our Site that links to the sites and services of insurance companies which may appear on our Site for online sale of insurance. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our Site. In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies and customer service policies. Browsing and interaction on any other website, including websites which have a link to our Site, is subject to that website's own terms and policies.

I. CHANGES TO THIS PRIVACY POLICY

Toffee will update this privacy policy from time to time. When we do, we will revise the updated date at the top 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 privacy policy periodically and become aware of modifications.

J. YOUR ACCEPTANCE OF THESE TERMS

By using this Site, you signify your acceptance of this policy. 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.

K. ROLES AND RESPONSIBILITIES

1. Data privacy officer

The Chief Information Security Officer shall be designated as the Data Privacy Officer for the purposes of implementation and administration of this Privacy Policy.

2. Grievance redressal officer

The Grievance Redressal Officer of the Company shall be designated as the Grievance redressal officer for the purposes of redressal of any grievances/complaints arising with respect to this Privacy Policy.

In case you have any grievances, the name and contact details of the Grievance Officer are provided below:

Mr. Shijo Raj

shijo.raj@toffeeinsurance.com