

PRIVACY POLICY FOR THRIIVE ART & SOUL LLP

Welcome to Thriive Art & Soul LLP (“Thriive”, “we”, “us” or “our”). For us, at Thriive, your privacy is placed on the highest pedestal and its protection is given the utmost level of importance. We are committed to a responsible and justified usage of your personal information, only to the extent for the provision of our services. This user-friendly document is meant to help you understand our common practices with regard to the personal information we collect from our users on our website, located at www.thriive.in, related online services and for other purposes that are permitted or required by law.

Our Privacy Policy explains how we work, collect, use, share and protect information in relation to our website and/or any software provided on or in connection with Thriive services (collectively, the “Services”), and your choices about the collection and use of your information.

By using our Services, you understand and agree that we are providing a platform for you to post content, including comments, personal information and such other materials (“User Content”), to the Services and to share the User Content publicly. This means that other users may search for, see, use or share any of your User Content that you make publicly available through the Services, which are in consonance with the Terms of Use {please insert the hyperlink} and this Privacy Policy.

Our Privacy Policy applies to all visitors, users, and others who access the Services (“users”). We reserve the right to make changes to this Privacy Policy from time to time, as and when required, however, we will notify you of such cases beforehand you may review the amended Privacy Policy and take an informed decision about your use of the Service.

1. What is the Information that we collect?

We collect the following information which includes but is not limited to the following:

- A. Personally Information (Examples: Address, phone number, age, gender, etc.)
- B. Your username, email address, password when you register for a Thriive account.
- C. User Content and/or any specific Online interaction (Examples: Testimonials, feedbacks and information requests received on the website)
- D. Information received through peer-to-peer electronic communication (Examples: Telephonic conversation, emails, online chat, etc.)

This document only deals with personal information and does not extend to business information (such as business and telephone number, which is not covered by privacy laws).

2. Collection of information

Thrive Art & Soul LLP is committed to providing the best possible experience to its users. Consequently, we collect information from Users at different points on our website in order to give the best optimized services to our Users, according to their individual needs.

At this website, your personal information is collected from you when you use the website to perform certain tasks, such as:

- i. Posting a testimonial or sending an email to us (such as your name and email address).
- ii. Sending an email to a Wellness Service Provider (“WSP”) from our database. Please note that we do not read or retain the message in your e-mail.
- iii. Calling a WSP using their number listed in our database.
- iv. Filling out a self-assessment or take a self-test.
- v. Subscribing to a publication or newsletter.
- vi. Purchasing a service package from us online. Your payment information is submitted directly to the credit card processor, who is responsible for its use and security.
- vii. Registering to be listed in our database. We collect information that will be used to create your profile in the database, such as name, address, email address, as well as such professional information as your qualifications, certifications, the demographic region in which you practice, and your fields of specialty. We collect additional information for our records that may not be displayed as part of your directory profile, but is necessary to check the information you provide or accept payment from you.

3. How we use your information?

General Use:

Personal information received by us is primarily used to meet your requests with regard to our services and for allied purposes.

Disclosure Policy:

We disclose your personal information in the manner below.

- i. Staff and WSP(s):*

We will share your personal information with our staff member(s) and WSP(s) for the purpose of providing services;

ii. Third Party:

We share information with third parties only when needed to deliver to you products or services that you request. We may use third-party advertising companies to serve ads when you visit our website. These companies may use information about you and your visits to this and other Web sites in order to provide advertisements on this website and other sites about goods and services of interest to you. When you click on links and/or ad banners that take you to third-party websites, the third party may collect information about you at their Website. The third party may have its own privacy policies that differ from ours. We encourage you to read such posted privacy statement(s) whenever interacting with any website you visit. However, we ensure that our agreements with such third parties ensure protection of your data to the standard we have stated herein.

iii. Statutory purpose:

In compliance with the applicable laws, we may be required to disclose certain information as required by the law enforcement or the courts. Such statutory disclosure shall not be construed as an infringement of this Privacy Policy.

Cookies:

We may use a software technology called "cookies" and similar technologies to create a personalized Web experience for our users. This technology is not used to collect personally identifiable information. It is only meant to customize your online experience with us and enables us to provide optimized services to you. We may ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party. More information is available in our "About Cookies" section. {please provide the hyperlink"}

Analytics information:

We use third party analytics tools to help us measure traffic and usage trends for the Services. These tools collect information sent by your device or our Services, including the web pages you visit, add-ons, and other information that assists us in improving the Services. We collect and use this analytics information from other users to identify any particular individual user.

Log files:

Like most standard website servers, our server uses log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track users'

movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses etc. are not linked to personally identifiable information contained in user profiles.

Device identifiers:

When you use a mobile device like a tablet or phone to access our Services, we may access, collect, monitor, store on your device, and/or remotely store one or more "device identifiers." Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by Thriive.

A device identifier may deliver information to us or to a third party partner about how you browse and use the Services and may help us or others provide reports or personalized content and ads. Some features of the Services may not function properly if use or availability of device identifiers is impaired or disabled.

In addition to some of the specific uses of information we describe in this Privacy Policy, we may use information that we receive to:

- help you efficiently access your information after you sign in
- remember information so you will not have to re-enter it during your visit or the next time you visit the Services;
- provide personalized content and information to you and others, which could include online ads or other forms of marketing
- provide, improve, test, and monitor the effectiveness of our Services
- develop and test new products and features
- monitor metrics such as total number of visitors, traffic, and demographic patterns
- diagnose or fix technology problems
- automatically update the Thriive application on your device

4. How and why we share your information:

We shall not rent or sell your information to third parties outside Thriive without your consent, except as noted in this Policy.

Parties with whom we may share your information:

- We may share User Content and your information (including but not limited to, information from cookies, log files, device identifiers, location data, and usage data) with businesses that are legally part of the same group of companies that Thrive is a part of, or that become part of that group ("Affiliates"). Affiliates may use this information to help provide, understand, and improve the Services (including by providing analytics) and Affiliates' own services (including by providing you with better and more relevant experiences). But these Affiliates will honor the choices you make about who can see the User Content.
- We also may share your information as well as information from tools like cookies, log files, and device identifiers and location data, with third-party organizations that help us provide the Services to you ("Service Providers"). Our Service Providers will be given access to your information as is reasonably necessary to provide the Service under reasonable confidentiality terms.
- We may also share certain information such as cookie data with third-party advertising partners. This information would allow third-party ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you.
- We may remove parts of data that can identify you and share anonymized data with other parties. We may also combine your information with other information in a way that it is no longer associated with you and share that aggregated information.

Parties with whom you may choose to share your User Content:

- Any information or content that you voluntarily disclose for posting to the Services, such as User Content, becomes available to the public, as controlled by any applicable privacy settings that you set. To change your privacy settings on the Services, please change your profile setting. Once you have shared User Content or made it public, that User Content may be re-shared by others.

What happens in the event of a change of control with respect to Thrive:

- If we sell or otherwise transfer part or the whole of Thrive or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address, User Content and any other information collected through the Services may be among the items sold or transferred to such organization. You will continue to own your User Content. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

Responding to legal requests and preventing harm:

- We may access, preserve and share your information in response to a legal request (like a search warrant, court order or summons) if we have a good faith belief that the law

requires us to do so. This may include responding to legal requests from jurisdictions outside of the India where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

We may share your information in any other circumstances where we have your express consent. In every event that we share your information with any third party, we ensure to the best of our efforts that your personal data is handled with securely without any danger of leakage or breach.

5. Children's privacy:

Thrive does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to register for the Services. The Services and its content are not directed at children under the age of 18. In the event that we learn that we have collected personal information from a child under age 18 without parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 18, please contact us. Upon receipt of information that a user is below the age of 18, we shall after due verification, promptly delete the concerned account and any related information;

6. Other web sites and services:

We are not responsible for the practices employed by any websites or services linked to or from our Services, including the information or content contained within them . Please remember that when you use a link to go from our Services to another website or service, our Privacy Policy does not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service and you allow them to access your User Content you do so at your own risk.

7. Your Rights:

Except as otherwise noted in this Privacy Policy, Thrive is a data controller under the European Union General Data Protection Regulation (“**GDPR**”), which means that we decide how and

why the information you provide to us is processed, including any third-party website or service whose links can be accessed through our Services. We do not collect or otherwise record, process, organize, structure, store, adapt, alter, retrieve, use, disclose by transmission, dissemination or otherwise making available a customer's personal information pertaining to his/her race, religion, caste, sexual orientation or health or any other information that may be deemed to be sensitive under GDPR (collectively, "**Sensitive Personal Information**") in the ordinary course of our business. Where we need to process your Sensitive Personal Information for legitimate purposes, we do so in accordance with the applicable law.

GDPR has provided the following rights to customers who are residents of countries who are members of the European Union:

- **Right to information** - including contact details to the Data Protection Officer of Thrive, the purposes for processing user information and the rights of the user.
- **Right to access** the Purchase Information that are processed by Thrive
- **Right to erasure** ("Right to be forgotten") - this includes the right of the user to have all personal data to be erased from the records of the data controller.
- **Right to rectification** of Purchase Information that is processed by Thrive
- **Right to restriction of processing personal data**
- **Right to data portability** of the Purchase Information supplied to Thrive by the user.
- **Right to object** (opt-out) to processing Sensitive Personal Data (unless Thrive otherwise has compelling legitimate grounds)

In the event you delete the account, we will not store your data beyond the period where it is required for us

8. How to contact us:

If you have any questions about this Privacy Policy or the Services, please find the appropriate support channel in the Help Centre at which you can contact the Data Protection Officer. In case of any complaints or grievances we request you to please provide the following information in your complaint:-

1. Identification of the information provided by you;
2. Clear statement as to whether the information is personal information or sensitive personal information;
3. Your address, telephone number or e-mail address.

9. Amendments:

We may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.

10. Security Policy:

We use reasonable security measures including SSL page encryption to protect the personally identifiable data of our users. Our servers are encrypted and stored safely. Your information is only shared with those people for whom it is absolutely essential to access such information, and no one else.

However, please note that we cannot absolutely guarantee the security of user information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of the user's information at any time.

11. Questions:

If you have any questions or feedbacks regarding our Privacy Policy, please feel to contact us at: accountmanager1@thrive.in or 7045933385