

# PRIVACY POLICY

We, Lyconet Marketing India Private Limited ("Lyconet/we/us", which expression shall include its parents/ affiliates/associates/sister concerns), take the protection of your personal data very seriously and strive to make the use of our services secure. We are also committed to observing all laws related to the protection of personal data. This Privacy Policy describes which of your data we collect and use, the purposes for which we do this, and how we protect your data. Please read this Privacy Policy carefully. If you apply to become a Lyconet Marketer, or if you use this website, it indicates that you have read and understood this Privacy Policy and agreed to terms of the same.

Any term or condition that appears in italics and which is not defined in this Privacy Policy, can be found in **Appendix I**, a glossary of defined terms, of the Lyconet Marketing Agreement.

## Contents

1. Area of applicability
2. Which data is recorded
3. Cookies and web tracking
4. Conversion measurement using the Facebook visitor action pixel
5. Sharing
6. Use of data
7. Data security and transferring data
8. Right of cancellation, information, changing data, and contact details

## 1. Area of applicability

Lyconet complies with Indian laws including the Information Technology Act, 2000 ("the Act") and the rules made thereunder, in the manner in which it collects, accesses, uses, stores, discloses, transfers, protects data. This Privacy Policy applies to the Lyconet Marketers and the users of this *Lyconet Website* <http://www.lyconet.com>. Please note that this refers to additional Lyconet websites, even to those of other countries, to which other data protection regulations may apply and for website/s outside India, the Lyconet Marketers are urged to go through the terms of the country specific Privacy Policy as that would be in adherence to the data privacy laws of the specific country.

As we continue to develop our websites to improve our services, we may need to amend and revise this Privacy Policy. You should regularly visit <http://www.lyconet.com> to find out whether this Privacy Policy has been modified and keep yourself apprised with the updates. In case the modification concerns how Lyconet will collect and use your information (including your personal data), we will ask for your consent prior to any modified use, by sending an email at the e-mail address provided by you.

## 2. Which data is recorded

Data that we collect, retain, use and process, as laid down in this Privacy Policy, about you includes data pertaining to your personal or material circumstances that we receive from you in association with or during the course of your participation in the Marketing Agency that can be attributed to you directly or indirectly (e.g. via your Lyconet ID). This includes your Lyconet ID, your full name, title, gender, date of birth, postal address, address coordinates (longitude and latitude), your telephone number(s), fax number, e-mail address, bank details, aadhaar card number/ passport number/voter id card number/permanent account number etc. and data regarding your shopping behaviour associated with your myWorld membership (*Purchase* date, place of *Purchase*, time of *Purchase*, *Purchase* amount, currency, shopping cart, industry, type of *Purchase* – online/offline, whether *Purchase* is with SME or key account, whether *Purchase* is using a voucher, whether *myWorld Card* was used to record the *Purchase* etc). We also process your company wording, date of incorporation, company address, any existing sectors, your CIN, GST, TIN, TAN, VAT, PAN, DSC and any other relevant business identification and registration numbers, billing email address, fax number, company website, sector, sales data, bank details, forename, surname, email address, date of birth and telephone number of the contact at your company and any products ordered. All data mentioned above are collectively referred to as "personal data". If you have given us this information, we will process the number and type of ID document presented, full name on the ID document, your nationality, place of birth, if available your personal number, your height, date of issue and expiry as well as the issuing authority of the ID, signature on the ID, the machine-readable zone, ID photo, selfie and liveness of the selfie. In addition, we process your t-shirt size and food preferences if you have provided this information as part of an event participation,

## 3. Cookies and web tracking

Our websites use cookies, which are small text files saved on your computer that can be accessed again later. Cookies enable you to log in to our services and help us customise our website for you.

You can also use part of our website without registering or logging in. In this case, certain information will also be recorded automatically to enable us to collect statistical data regarding the use and efficiency of our website and to adapt it to suit the needs of our users. We therefore record and process information about your IP address, the time and length of your visit, the number of visits, your use of online forms, your search settings, your view setting, and your favourites setting on our website. Cookies are stored for a range of different periods. The majority of the cookies we use are deleted automatically as soon as you leave the website ("session cookies"). We make a record of every time our website is accessed and every time a user opens one of the files stored on the website. The cookies set by us are solely for our information and are processed by myWorld International AG, Grazbachgasse 87-91, 8010 Graz, Austria on behalf of Lyconet Marketing India Private Limited to evaluate the information collected.

We use JavaScript to record your usage behaviour on our website in order to adapt our web services to the needs of our users. In doing so, we determine your browser type, location, time, and duration of your use, URL, page name, and the website that referred you to our page. You can stop us from recording this data by disabling JavaScript directly in your browser.

We also use the following tools:

## Google Analytics

This is a web analytics tool by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google", to record your online activities on our site and to determine how many users are visiting us, what contents of our page are viewed, and how many times. The evaluation is done anonymously. Google Analytics cookies, including the Google Analytics tool "anonymous IP address" and usage data, are usually transmitted to a Google server in the United States and stored there. For further information, please refer to <https://support.google.com/analytics/answer/6004245?hl=de>. At <https://tools.google.com/dlpage/gaoptout?hl=de>, Google Analytics offers the option to opt out of data collection.

## Matomo Analytics Platform

We record your online activities on our site and determine how many users visit us on the Internet and which content of our site is viewed and how often. The evaluation is anonymous. The cookies are stored on your computer. For more information, please visit [Privacy Policy - Analytics Platform - Matomo](#).

## Google AdWords

This is used to record website visits for advertising purposes (remarketing) in Google and in the Display Network. When you visit a website, your browser saves cookies that allow you to be recognised as a visitor when you visit websites that belong to Google's advertising network. On these pages, ads that relate to content that you previously viewed on other websites that use Google's remarketing function can be presented to you as a visitor. You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>.

## Google AdWords conversion tracking

We use this to generate conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad placed by Google. According to Google's privacy policy, no personal information is processed. If you do not wish to participate in tracking, you can opt out of this usage by disabling the Google conversion tracking cookie in the usage settings of your Internet browser.

## Salesforce Marketing Cloud

We use this to record your behaviour on our website to optimise our product offering. It helps us determine how many users visit us in the Internet, which content of our site is viewed, and how often. The evaluation is done anonymously and is used automatically by predictive intelligence to improve the presentation of our product offering. For registered Lyconet Marketers, the user-related behaviour on the website is recorded to improve the user experience and is used to display the relevant content. Salesforce cookies are usually delivered to a Salesforce server in the United States and stored there.

## Microsoft Application Insights

Application Insights is a service from Microsoft that enables us to monitor and improve the performance and usability of the Website. The service stores and analyzes anonymized telemetry data (Number of pageviews, page load times, exceptions encountered and tracing of AJAX dependencies). The cookies (-ai\_user, ai\_session) are usually transmitted to a Microsoft server in the USA and stored there.

## Hotjar

We collect non-personal information, including standard internet log information and details of your behavioural patterns when you visit our website. This is done to enable us to provide you with a better user experience, to identify preferences, to diagnose technical problems, to analyse trends and to improve our website.

The following information may be collected related to your device and browser: device's IP address (captured and stored in an anonymized form), device screen resolution, device type (unique device identifiers), operating system, and browser type, geographic location (country only), preferred language used to display our website. The following information is collected related to your user interaction: mouse events (movements, location and clicks), keypresses.

For a sampling of visitors, Hotjar also records information which is collected from our website: referring URL and domain, pages visited, geographic location (country only), preferred language used to display our website, date and time when the website pages were accessed.

You may opt-out from having Hotjar collect your information when visiting our website at any time by visiting the [Opt-out](#) page <https://www.hotjar.com/opt-out> and clicking 'Disable Hotjar'.

## Yandex Metrica

This is a web analytics tool from YANDEX LLC, with a registered office located at 16 Lva Tolstogo St., Moscow 119021, Russia, and its affiliate, Yandex Oy, with a registered office at Moreenikatu 6, 04600 Mantsala, Finland. We use this tool to log your online activity on our website, to find out how many users visit us and to record the number of times they access each page. This process is anonymous. The cookies are stored on your computer. For more information, please visit [https://yandex.com/legal/metrica\\_agreement/](https://yandex.com/legal/metrica_agreement/)

## Functional Cookies

Due to the dynamic structure of our website, additional cookies only for short-term use may be used, particularly for temporary promotions. These cookies are not personalised but are exclusively functional in nature. To offer you full transparency, we use an external provider who regularly checks our websites and the respective active list can be pulled up [here](#).

Please note that the standard Internet browsers accept cookies according to the default settings. You can also set your browser to refuse all or certain cookies or to ask you before a new cookie is received. The relevant instructions are provided by most browsers under the "Help" menu item in the menu bar. There you will also find out how to delete the cookies you have already received.

Please note that you may not be able to use all the features of our websites if you do not accept any or only some cookies.

By using our website, you agree that the cookies and tools mentioned above may be used.

#### **4. Conversion measurement using the Facebook pixel**

With your consent, we use the "Facebook Pixel" by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook") on our website. This is a cookie, i.e. a small text file that is stored on your computer and can be accessed again later. With its help, actions of users can be tracked after they have seen or clicked on a Facebook ad. This allows us to track the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, it does not provide any information on the identity of the users. However, the data is stored and processed by Facebook, so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook Data Policy (<https://www.facebook.com/about/privacy/>). You can allow Facebook and its partners to display ads on and off Facebook. A cookie may also be stored on your computer for these purposes. By using the website, you agree to the use of the visitor action pixel.

**You may withdraw your consent to use the visitor action pixel at any time. If you wish to withdraw your consent, please reach out to the Grievance Officer, at the contact details mentioned in paragraph 9, below.**

#### **5. Links to other websites & Sharing**

Our website includes links to other websites whose privacy policy and practices may differ from those of ours. If you submit your data to any of these websites, your data is governed by their privacy statements. We strongly recommend that you carefully read the privacy statement of any website you visit.

The website contains "Share" buttons for the social networks **Twitter Inc.**, 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, **XING**, which is operated by XING AG, Dammtorstrasse 30, 20354 Hamburg, Germany, **LinkedIn** Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, and **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, USA. In addition, there is also a "Share" button for e-mail. The "Share" buttons can be recognised by their respective logos.

All "Share" buttons are set up in compliance with data protection requirements. A direct connection between your browser and the server of the operator of the respective social network is established only when you click on the respective "Share" button on this website (and only then). According to the operators of the social networks mentioned, no personal data is collected by the social networks without a click on the respective "Share" button. Only data of logged-in Marketers, including the IP address, is collected and processed. If you do not wish to associate your visit to our website with your user account of the respective social network, please log out of the user account of that social network.

Here we wish to point out that, as the provider of the website, we do not receive any information regarding the content of the data transmitted and its use by the social networks. For more information about the use of data by the social media networks, please refer to the privacy policies of the social networks mentioned.

#### **6. Use of data**

We collect and process the personal data that you provide to us when you register as a Lyconet Marketer. We use your personal data only in compliance with legal requirements and solely for your activity in connection with the Marketing Agency so as to be able us to fulfil our contractual obligations towards you, and furthermore, for such other purposes as for which you expressly give us your consent.

For example, we use your data to communicate with you, to verify your identity, to provide you with your personal log-in area on <http://www.lyconet.com>, to process your enquiries or orders, or to provide you with our services. In addition, we also use your personal data to determine and allocate to you the remuneration as a result of your activity in connection with the Marketing Agency.

If you have also given us your separate consent to do so, we will also use your data for marketing purposes, for example, to inform you of offers and promotions, to inform you about any events that we organise, etc.

We will not use any of your personal data for marketing purposes and will not transfer it to *Third-Parties* for direct marketing purposes, unless with your express written consent.

This consent is revocable i.e. even if you have given such consent to Lyconet, you may request to stop receiving any newsletters, SMS or other direct marketing materials/communications at any time by writing to [india@lyconet.com](mailto:india@lyconet.com).

#### **7. Data storage, data security and transferring data**

You hereby acknowledge, agree and authorize us to retain and store your data in the database of Lyconet Marketing India Private Limited (having its registered office at DLF Prime Tower, Room No. 816, 8th Floor, Plot No. F 79-80, Okhla Industrial Area, Phase-1, New Delhi-110020, India) and myWorld International AG (having its registered office at Grazbachgasse 87 - 91, 8010 Graz, Austria), in Austria and Liechtenstein, and at the sub-contractor commissioned by Lyconet i.e. Salesforce.com EMEA Limited, Company No. 05094083, having its registered office at Floor 26 Salesforce Tower, 110 Bishopsgate, EC2N 4AY London UK.

To protect your data, we use measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other state-of-the-art security measures. When communicating via e-mail, the security of the data is limited according to the current state of the technology of *Third-Party* email service providers.

For purchases made on the website, the following data may be passed on to the payment service provider named in the respective payment process using the 3D Secure v2 process as part of fraud prevention when a selected payment method is processed by an external payment service provider: First name and last name, birthday, gender, last date on which changes were made to the member ID (limited to billing and delivery address changes), changes to account data or user data, registration date, whether a password for the member ID exists and when the password was last changed, data on purchasing activity on our website (number of payment attempts in the last 24 hours, number of payment attempts in the last year, number of purchases in the last 6 months), company data (company wording and tax identification number), contact data (email address, cell phone number, telephone number).

In order to carry out a know-your-customer (KYC) process, which is necessary in some cases, we use the Klippa App B.V., Lübeckweg 2, 9723 HE Groningen, Netherlands, as a service provider. These are OCR services (optical character recognition) for analyzing ID documents. Apart from the

scanning process, Klippa does not store any of the transmitted personal data. For more information, see OCR Software - [Automatic Text Recognition for Receipts and Invoices \(klippa.com\)](#).

The Lyconet Group operates internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal data abroad, subject to your consent. Your data is basically used by Lyconet Marketing India Private Limited as the contractual partner of Lyconet Marketers of Lyconet group entities that use myWorld International AG as their service provider. However, your personal data may be shared with / passed on to certain service providers listed below and within the Lyconet and myWorld Group.

We use certain service providers to handle our services, to communicate with Lyconet Marketers, and to manage our online presence. We select these service providers carefully so as to ensure that the data is processed as per applicable laws. In addition, we have also obligated the service providers to use your personal data only according to our instructions for specific purposes and in accordance with the applicable data protection regulations. Any other use of the data by these service providers is excluded.

For purchases made on the website, the following data may be passed on to the payment service provider named in the respective payment process using the 3D Secure v2 process as part of fraud prevention when a selected payment method is processed by an external payment service provider: First name and last name, birthday, gender, last date on which changes were made to the member ID (limited to billing and delivery address changes), changes to account data or user data, registration date, whether a password for the member ID exists and when the password was last changed, data on purchasing activity on our website (number of payment attempts in the last 24 hours, number of payment attempts in the last year, number of purchases in the last 6 months), company data (company wording and tax identification number), contact data (email address, cell phone number, telephone number).

In furtherance to this Privacy Policy, we will share your personal data while ensuring the required data security measures within the Lyconet Group, provided that this is necessary for the purpose of electronic processing and management or for the provision of a specific service for you. The entities of the Lyconet Group are also obligated to us to use your personal data, within the framework of this Privacy Policy, only for the specific purposes in each case, and according to the applicable data protection regulations. In particular, the services concerned include contacting by electronic messages (e.g. e-mail, SMS, or push notification), by fax, by telephone, or by letter informing about products and promotions, identifying offers that suit your interests, conducting satisfaction surveys, operating hotlines, and processing transactions. If and to the extent that this is necessary for the provision of a specific service to you, we will provide *Third-Parties* with the personal data required for this purpose. The *Third-Parties* in turn will be obligated to us to use your personal data only for the specific purpose in each case and according to the Indian data protection regulations.

We will not share your personal information with anyone other than the above-mentioned service providers, and Lyconet companies, unless you have given us your consent.

## **8. Right of withdrawal, information, changing data and contact details**

**You have the option, at any time, to withdraw your consent regarding the future use of your personal data used on this website without stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. If you wish to withdraw your consent, please send a written declaration (by letter or e-mail), to the Grievance Officer, at the contact details mentioned in paragraph 9, below.**

If you have any questions regarding the use of your personal data or if you wish to access, update or correct your data, **please reach out to the Grievance Officer, at the contact details mentioned in paragraph 9, below.**

## **9. Grievance Officer**

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:

Ms. Krati Mehrotra

E-mail: [grievanceofficer.in@lyconet.com](mailto:grievanceofficer.in@lyconet.com)

Address: DLF Prime Tower, Room No. 816, 8th Floor, Plot No. F 79-80, Okhla Industrial Area, Phase-1, New Delhi-110020, India

## **10. Governing Law:**

This Privacy Policy will be governed in accordance with the laws of the Republic of India.

All claims, differences and disputes arising under or in connection with this Privacy Policy will be subject to the exclusive jurisdiction of the courts at New Delhi.

## **11. Notice:**

All notices by Lyconet to you/user will be served by email or by general notification on the website. Any notice provided to Lyconet pursuant to this Privacy Policy should be sent via email at: [india@lyconet.com](mailto:india@lyconet.com) or through registered post to:

Lyconet Marketing India Private Limited  
DLF Prime Tower, Room No. 816, 8th Floor, Plot No. F 79-80  
Okhla Industrial Area, Phase-1  
New Delhi-110020, India

## **12. Severability:**

If, for any reason, a court of competent jurisdiction finds any provision of this Privacy Policy or portion thereof, to be unenforceable, the remainder of the Privacy Policy will continue in full force and effect.