

# **PRIVACY POLICY**

Please read this Privacy Policy very carefully before downloading, installing and using the CONSTROWISE mobile or desktop application ("Platform ") which is licensed to and operated by GOLDENKEYPMC PRIVATE LIMITED having its registered office at GOLDENKEYPMC PRIVATE LIMITED, 1st Floor, Lilly Book Centre, Assumption College junction, Changanacherry, Kottayam District, Kerala, India. Pincode-686101 ("Constrowise", "We" and "Us"). "Constrowise" collects, uses, maintains and discloses information collected from the users of mobile or desktop application and/or services connected with it ("You", "Your", "User"). This Privacy Policy applies to Constrowise mobile or desktop application software technology ("Platform" or "Constrowise"), and services offered by "Constrowise" in connection with the Platform ("Services"). By using or by registering Your profile with the Platform and/or by using Services offered in connection with the Platform, You are consenting to the use, collection, transfer, storage, disclosure and other uses of Your information in the manner set out in this Privacy policy. For the purpose of this policy, any reference to "Constrowise" shall include its affiliates, parent company (GOLDENKEYPMC PRIVATE LIMITED), subsidiaries and sister concerns limited to any third-party websites, services, applications, or businesses (Third-Party Services). "Constrowise" does not take responsibility for the content or privacy policies of those Third-Party Services "Constrowise" encourages You to carefully review the privacy policies of all Third-Party Services You access through the Platform.

This privacy policy is subject to the Platform's User Agreement.

If You do not agree to any of the provisions of this Privacy Policy, You may not download, install and/or use the Platform and/or Services. "Constrowise" may revise, alter, add, amend or modify this Privacy Policy at any time by updating this page. By updating, downloading, installing and/or continuing to access/use this Platform, You agree to be bound by any such alteration, amendment, addition or modification.

## **1. Privacy of Users**

"Constrowise" takes the privacy of its users seriously and exercises best efforts to protect their private data/information. "Constrowise" endeavors to provide a secure and reliable environment for using its Platform and Services. Any private information collected by "Constrowise" from You will be used only in accordance with this Privacy Policy and the terms and conditions provided hereunder. This Privacy Policy sets out what information "Constrowise" collects from You, how that information may be used, how the information will be protected, and what choices You have as a user. You are advised to read the policy carefully and provide Your consent only if You agree with the terms of the Policy.

## **2. What information may be collected by Constrowise**

"Constrowise" may collect information from Users at various stages from registration on the Platform by the Users to submission of content by the Users or while the User is accessing/using Services. The information collected may be personally identifiable information or other information. You may choose to not provide the information if You do not wish to use the Platform and/or Services.

### *2.1 Personally Identifiable Information*

"Constrowise" may collect personal information that identifies You in a variety of ways, including, but not limited to the information submitted during download, installation and/or use/access of the Platform or in connection with access/use of Services or features offered through the Platform or in connection with the Platform. "Personal information" of a person means any information which, either directly or indirectly, in combination with other information available or likely to be available is capable of identifying such person. Personally identifiable Information collected may include Your name, image, mailing address, email address, phone number, Company name/College name, Designation/ Course of study and demographic information such as gender, nationality, postcode and other personal information including but not limited to date, time or place of birth, location, interests, preferences, likes and dislikes, shares and usage information. "Constrowise" collects Personally Identifiable Information only if You voluntarily submit such Services (for example when You use the facilities or Services connected with the Platform or engage in certain Platform related activities including but not limited to becoming a member or signing up for an account or linking an account through a social network including, but not limited to Facebook, Twitter, Google Plus, and/or LinkedIn). "Constrowise" may also collect personally identifiable information You may provide when corresponding with us by e-mail or phone, or to access/use any other interactive/non-interactive features of the Platform and/or Services. You can always refuse to supply personally identifiable information, except that it may prevent You from using the Platform, and/or certain features of the Platform and Services.

### *2.2. Non-personal Information*

"Constrowise" may collect Your non-personal information whenever You use, access or interact with the Platform and/or use Services. Non-personal information may include the mobile or computer's name, version, the type of device used, users' operating system and version, the unique ID of the mobile device, third-party apps or websites or services that referred You to this Platform, language preferences, location information, IP address, technical information, information about third-party apps including without limitation package name (which is same as the package id on play store), package version, installation and/or uninstallation event information and other similar information about the User. You may not download, install and/or use the Platform if You do not wish to provide or share personally identifiable and/or other information with "Constrowise". By providing personal and other information/data to "Constrowise", You are agreeing to permit/allow "Constrowise" to use the said information as provided in this Privacy Policy.

## **3. How Constrowise uses the information collected**

"Constrowise" may collect and use Your personal information and other information for business and/or non-commercial purposes. "Constrowise" may use the information for the following purposes:

3.1 Your email address and password may be used to identify You while logging into the Platform. "Constrowise" may use Your personal information to control Your access to the Platform as well as use of the Platform and Services, to communicate with You, customize Your experience of using the Platform and and/or the content of any email newsletter or other material that "Constrowise" may send from time to time, and provide information that may be useful or interesting based on the content and personally identifiable information. Your email address may be used to send user information, administrative information, changes in account settings and any changes to the Platform/Services or

updates on new policies of "Constrowise". Apart from this if You choose to opt-in to our mailing list, You will receive periodic emails that may relate to company news, related product or service information, etc. Your email address may also be used for responding to any of the inquiries, questions, and/or any other requests made by You. If at any time You want to unsubscribe from receiving future emails, "Constrowise" has included detailed unsubscribe instructions at the bottom of each email, or You may contact "Constrowise" via the Platform/mail.

3.2 "Constrowise" may further use the collected information to analyze the use of the Platform and/or Services, and the people visiting and using the Platform, for the purpose of improving the features of the Platform. "Constrowise" may use Your Information to analyze Your use of the Platform for providing You customized content, advertisements and features. Information provided by You helps "Constrowise" in responding to Your customer service requests and support needs more efficiently.

3.3 "Constrowise" may use information in the aggregate to understand how users, as a group are using the Platform and/or Services. "Constrowise" may use the personal information provided by the User to prevent or take action against activities that are, or may be, in breach of the "Constrowise" User Agreement, Terms and Conditions and any applicable laws.

3.4 "Constrowise" may use Your non-personal information like information regarding third-party apps, including without limitation, package name (which is same as the package id on play store), package version, installation and/or uninstallation event information for personalizing contents and Services based on Your interests. "Constrowise" may also use Your non-personal information for promoting content with respect to, or from other applications installed or used by You or for creating customized sharing options for You.

3.5 "Constrowise" may use Your Information to analyze Your use of the Platform and Services and the people visiting and using the Platform and Services for improving the features of the Platform and Services. While accessing, using or installing the Platform and/or Services, Your Information may also be accessible to third parties whose SDKs (Software Development Kits) are included in the Platform. Such SDKs may include, but not be limited to Google ads, Google Platform Indexing, Google Support Library, Google Design Library, Google authentication for login, Mobvista (Ads), Appnext Native (Ads), Appnext Interstitial (Ads), Facebook Audience Network (Ads), vmax (Ads), Mastadview (mraid), Glide for graphics, Branch IO for deeplink support, Baidu (Ads), Firebase for deeplink support, IMA (Ads), Appnext Actions (Ads), Picasso for image handling, RxJava, Retrofit and Dagger for code efficiency, OkHttp for network efficiency, Otto event bus, Disklruccache for memory optimizations, Facebook connection class for network quality assessment, Facebook sdk for login, and sql lite asset helper for performance optimization. These SDKs may use Your information for generic analytical, and other purposes.

3.6 "Constrowise" may also use Your Information for market research purposes and may share Your Information with its affiliated businesses that it controls (including GOLDENKEYPMC PRIVATE LIMITED). "Constrowise" may also use Your information for targeted advertising, targeted content delivery, and other business purposes unless You specifically opt out of such uses.

3.7 "Constrowise" may use Your personally identifiable and/or other information You submit while accessing/using the Platform and Services, providing feedback, making/submitted comments, providing inputs and/or interacting on the Platform and Services for improving User experience on the Platform and in connection with Services,

to provide targeted content, advertising and Services, and for other business and/or non-commercial purposes.

#### **4. How Constrowise protects User information**

4.1 "Constrowise" adopts appropriate data collection, storage, control and processing practices and security measures to protect against unauthorized access, alteration, disclosure, or destruction of Your personal information, username, password, and data stored on the App. "Constrowise" takes care of Your personal information by taking security measures such as password protection, and by monitoring security vulnerabilities at regular intervals and by taking remedial steps to prevent data breach and loss.

4.2 Personal information exchange between the App /Services and Users is protected by "Constrowise" using a Token Based Authentication. "Constrowise" cannot guarantee the security of any information obtained through unauthorized entry or use, hardware or software failure, and other factors that may compromise the security of User information at any time. It is important for the User to prevent unauthorized access to his/her account and personal information by limiting access to his/her device.

#### **5. Sharing User Information**

5.1. "Constrowise" does not sell, trade, or rent Your personally identifiable information collected by "Constrowise" to third parties except as provided in this Policy. "Constrowise" may share generic aggregated demographic information not linked to any personally identifiable information, regarding visitors and users with "Constrowise" business partners, contractors, affiliates (including GOLDENKEYPMC PRIVATE LIMITED) and advertisers.

5.2. At times, "Constrowise" may be required by law or litigation to disclose personal information about the users. "Constrowise" may also disclose information about the users if "Constrowise" determines that for national security, law enforcement, or other issues of public importance that disclosure of information is necessary.

5.3. "Constrowise" reserves the right to transfer Personal Information of users to another party as a result of business partnership, contractual engagement, merger, acquisition, or sale of all or a portion of "Constrowise" assets to another party, and under such a circumstance, the provisions of this privacy policy will continue to apply unless You are notified otherwise.

#### **6. Cookies**

6.1 Whenever You access the Platform and/or Services "Constrowise" may place cookies on Your hard drive for record-keeping purposes to enhance Your experience or sometimes to personalize Your experience. Cookies are small text files that are placed on Your computer's hard drive by the Platform You visit. Cookies help "Constrowise" to identify information relating to Your activities and to retain information relating to Your preferences and history on the Platform

6.2. "Constrowise" and/or its service providers may use advertising cookies to deliver ads that are more relevant to You and Your interests unless You opt out of such advertisements.

6.3. You may choose to disable cookies by turning off cookie feature on the web browser. However, by disabling this feature, some parts of the Platform may not function properly. This may prevent You from taking full advantage of the Platform and Services.

## **7. Combining Information**

"Constrowise" may combine Your personal and other information across the Platform and Services in order to provide offers, promotions and information that is most relevant to Your interests, likes and/or preferences. "Constrowise" may also combine information You share with "Constrowise" on the Platform and with respect to Services with information You have provided to third parties, who have been authorized by You to share the information with us, for providing content, advertising, promotions, and offers, and for improving User experience on the Platform and Services. "Constrowise" may share Your information with third parties, who have Your information, and who are authorized to combine information.

## **8. How long Constrowise retains your data**

"Constrowise" will keep personal information of Users for only as long as is necessary for the purpose for which it was collected. At the end of that retention period, "Constrowise" may either delete the information, or anonymize it.

## **9. How You Can Stop Constrowise from Using Your Data**

9.1 "Constrowise" values Your preferences, and provides You options to stop direct marketing communications from us. You may stop direct marketing communications from us by doing any of the following:

- Click 'unsubscribe' or 'log out' from email communications from a particular division, service, or team;
- Login into Your account and change Your privacy preferences; and/or Write to us to "Constrowise" address provided here under. For any privacy related issues, you may mail us or write to us in the following address:

GOLDENKEYPMC PRIVATE LIMITED,  
1<sup>st</sup> Floor, Lilly Book Centre,  
Assumption College Junction,  
Changanacherry, Kottayam District,  
Kerala, India, Pin code-686101

e-mail ID : [mail@constrowise.com](mailto:mail@constrowise.com)

9.2. If You opt out of marketing communications, You may still receive non-promotional emails/notifications from "Constrowise", such as emails about Your account, updates with respect to the Platform and/or Services, and/or any other business communications.

9.3. You may uninstall and/or discontinue using the Platform and Services by deleting the Platform from Your device if You disagree with the privacy policy, or do not wish to share Your information for uses provided in this policy.

## **10. Consent**

You hereby confirm that You have understood the terms and conditions of this policy and consent to the collection, storage, processing and use of Your personal and other information in accordance with the terms and conditions of the policy. You agree to not use the Platform and services offered by "Constrowise" if You do not wish to share Your personal and other information.

### **11. Changes and Updates to this Privacy Policy**

"Constrowise" may update and revise this Privacy Policy from time to time. The revised Privacy Policy will be posted as notification here. You are encouraged to periodically check this page to stay informed about changes to this Privacy Policy. You hereby acknowledge and agree that it is Your responsibility to review this Privacy Policy periodically and become aware of the modifications. If You disagree to any of the changes to the Privacy Policy, You shall refrain from using or accessing the Platform and Services. Your continued use of the Platform and/or Services following the posting of the revised Policy shall indicate Your acceptance and acknowledgement of the changes and You will be bound by the changed policy.

### **12. Contacting Us**

If You have any questions about this Privacy Policy, practices of this Platform or Services, or Your dealings with the Platform or any of the features or any Legal Queries about the Platform, please send your questions to "Constrowise" at [mail@constrowise.com](mailto:mail@constrowise.com) with the subject, "Privacy Queries".

### **13. Privacy Grievances**

If You have any privacy grievances or concerns, You may contact "Constrowise" privacy grievance officer by email or mail. You may send Your grievances to the email address [mail@constrowise.com](mailto:mail@constrowise.com) with the subject "Privacy Grievance".

### **ACCEPTANCE OF THIS PRIVACY POLICY**

By downloading, installing, and accessing/using the Platform and Services, You are signifying Your acceptance of this Privacy Policy. If You do not agree to this Privacy Policy, You shall not download, install, access or use the Platform and Services. Your continued Access or Use of the Platform and Services following the posting of changes to this Privacy Policy will be deemed to be the acceptance of such changes.