

## **Privacy and Data Protection Policy**

### **1.0 PURPOSE**

The purpose of this policy is to make meaningful disclosure of how Amideeptech.com (hereinafter referred to as RADIOLOCUS) treats and processes data collected by it from individuals' mobile phones via its sensors deployed in various retail outlets or any other physical location.

### **2.0 SCOPE**

This policy outlines how RADIOLOCUS seeks to store, process and share information/data collected by it. It also outlines rights of the Data Provider vis-à-vis data that is collected and processed by RADIOLOCUS to provide insights into consumer behavior and a better shopping experience.

### **3.0 APPLICABILITY**

RADIOLOCUS may collect data/information from your ("data provider's") mobile phone when you visit any store/retail outlet where RADIOLOCUS sensors are deployed. Such information/data may include:

- 1) MAC Address of the Mobile Phone;
- 2) Signal strength of the Mobile Phone;
- 3) Mobile Phone Manufacturer

RADIOLOCUS collects such data under a lawful contract for legitimate business purposes. Data protection is the moral and ethical duty of RADIOLOCUS.

## **4.0 IMPORTANT TERMS**

### **4.1 Data**

Means a representation of information, knowledge, facts, concepts or instructions which are being prepared or have been prepared in a formalized manner and is intended to be processed, is being processed or has been processed in a computer system or computer network and may be in any form (including computer printouts magnetic or optical storage media, punched cards, punched tapes) or stored internally in the memory of the computer.

### **4.2 Data Provider**

You (Person whose mobile phone data RADIOLOCUS may collect)

### **4.3 Information**

Includes data, text, images, sound, voice, codes, computer programs, software and database or micro film or computer generated micro fiche”

## **5.0 PURPOSE OF COLLECTION**

RADIOLOCUS may collect information from Data Providers’ mobile phones for the following purposes:

- To aggregate, process, store and analyze such information and share reports generated out of such analysis with retail outlets and physical locations to recognize and use consumer behavior and trends in such outlets and locations to make them more consumer centric;

- To enable stores and retail outlets that have a legal contract with RADIOLOCUS to improve consumer experience and justify their business decisions;
- To enable stores and retail outlets make smarter decisions by optimising marketing plans, operational effectiveness and merchandising options;
- To provide a better shopping experience for the Data Provider

#### **6.0 RADIOLOCUS's RESPONSIBILITY**

- a) RADIOLOCUS collects, processes and analyzes such information/data only in pursuance to its business activities and not otherwise;
- b) RADIOLOCUS keeps such information/data secure according to its documented information security program and information security policies;
- c) RADIOLOCUS hashes the information/data (MAC addresses) it collects to de-personalize the same before processing and storage. It is computationally infeasible to obtain the original data from hashed data and RADIOLOCUS does not attempt to do so.
- d) RADIOLOCUS aggregates the data it collects to provide relevant reports to its clients about consumer behavior;

e)

## **7.0 RIGHTS OF DATA PROVIDER**

7.1 The Data Provider (You) can choose not to be a part of RADIOLOCUS data analytics program by submitting your MAC address to RADIOLOCUS. RADIOLOCUS will remove any existing data about your mobile phone and will not collect any data about your MAC address in the future.

7.2 The Data Provider may choose to opt out of the RADIOLOCUS Data Analytics Program by visiting [www.radiolocus.com](http://www.radiolocus.com). Once the Data Provider opts out of the RADIOLOCUS data analytics program, RADIOLOCUS will no longer store, process or aggregate the Data Provider's data except to maintain the opt-out status of the Data Provider's device. All references to the Data Provider's data will be removed from all active systems of RADIOLOCUS.

7.3 Once RADIOLOCUS receives a request from a Data Provider to opt out of the RADIOLOCUS Data Analytics Program, it will never re-identify the data belonging to that Data Provider in any subsequent data operations.

7.4 Any further queries about the opt-out process specifically or about privacy concerns of a Data Provider may be sent to [privacy@amideeptech.com](mailto:privacy@amideeptech.com). RADIOLOCUS undertakes to answer all such queries faithfully and earnestly.

## **8.0 DISCLOSURE OF DATA**

8.1 RADIOLOCUS will not use/disseminate/disclose such information/data except as outlined in this Policy.

8.2 RADIOLOCUS may disclose such data under mandate of law for the purpose of verification of identity or for prevention, detection and investigation including cyber incidents, prosecution and punishment of offences.

8.3 RADIOLOCUS shares data only with its clients, i.e., retail stores or management of physical premises where RADIOLOCUS sensors are located.

8.4 RADIOLOCUS may generate and share publicly periodic reports about consumer trends using aggregated, non-personal data collected by RADIOLOCUS.

8.5 RADIOLOCUS provides only non-personal data to its clients. RADIOLOCUS **does not** provide identifiable device-specific data to its clients or any third party.

8.6 RADIOLOCUS does not commercially or otherwise disclose device-specific data including not disclosing such data for the purpose of employment eligibility, promotion or retention; credit eligibility; health care treatment eligibility; and insurance eligibility, pricing or terms.

8.7 Notwithstanding anything contained in this Article, RADIOLOCUS may disclose such information/data by an order under the law for the time being in force.

## **9.0 RETENTION OF DATA**

RADIOLOCUS retains hashed device-specific information collected from a Data Provider and other non-personal data until the Data Provider opts-out of the RADIOLOCUS Data Analytics program. Once the Data Provider opts-out of the RADIOLOCUS Data Analytics Program, the information collected from a Data Provider is removed from RADIOLOCUS's database and archived and is never processed nor considered for any operation other than to maintain the Data Provider's

opt-out status.

## **10.0 THIRD PARTY POLICY**

RADIOLOCUS transfers aggregated mobile location analytics reports to third parties in fulfillment of its contractual obligations. To generate such reports, RADIOLOCUS uses Data Provider's aggregated, device specific, non-personal data. RADIOLOCUS provides third parties access to non-personal, non-identifiable device specific data stored on its computer systems.

RADIOLOCUS does not itself or through its data operations, identifies the Data Provider. RADIOLOCUS obligates third parties through contract to follow and to maintain, at the minimum, the same level of data protection standard that RADIOLOCUS itself adheres to. Third parties are free to follow a higher level of data protection standard than is followed by RADIOLOCUS in relation with the RADIOLOCUS data analytics program.