

## **PRIVACY POLICY**

**Effective Date: 09<sup>th</sup> August 2018**

At Think Quant Solutions Pvt. Ltd., a company incorporated under the Companies Act, 2013 having its principal place of business in New Delhi, India (hereinafter "Think Quant", "we", "our" or "us"), your privacy is of great importance to us. We understand that you entrust us with certain Personal Information (*as defined below*) to help us provide various services. In exchange for your trust, you expect and deserve our commitment to treat your information with respect and in accordance with the terms of this privacy policy ("**Privacy Policy**").

Think Quant values your privacy. In this Privacy Policy ("Policy"), we describe the information that we collect about you when you use and access the "Prosportsleague" (PSL) website [www.prosportsleague.com](http://www.prosportsleague.com) (the "PSL Website") and the "PSL" Application platform accessible through desktops, mobile phones, smart phones and tablets (Collectively the "PSL Platform") which includes the computer software, associated media, collaterals, and online or electronic documentation and offers various contests and games (including fantasy games), being conducted on the Platform (Contest(s)) and other products or services, and how we use and disclose that information. The words "you" or "your" as used herein, refer to all individuals, including Registered Users accessing or using the PSL Website, PSL Application, or services offered therein for any reason. Think Quant is the owner of the PSL Website and/or PSL Application.

If you have any questions or comments about the Privacy Policy, please contact us at [support@thinkquant.in](mailto:support@thinkquant.in). This Policy is incorporated into and is subject to Think Quant's Terms of Use with Registered Users, which can be accessed at [www.prosportsleague.com/terms\\_and\\_conditions](http://www.prosportsleague.com/terms_and_conditions). Your use of the PSL Website, PSL Application and/or services offered thereunder and any personal information you provide on therein remains subject to the terms of the Privacy Policy and Terms.

BY ACCESSING OR USING THE PSL WEBSITE, THE PSL APPLICATION, AND /OR SERVICES PROVIDED THEREIN, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD AND AGREE TO BE BOUND BY THIS PRIVACY POLICY AND OUR TERMS OF USE. IF YOU DO NOT AGREE TO THE TERMS AND/OR PRIVACY POLICY DO NOT USE THE SERVICES.

### **1. YOUR PRIVACY - OUR COMMITMENT**

We recognize the importance of your personal privacy. Please read the following policy to understand how your Personal Information will be treated as you make full use of our services and participate in Contests through the PSL Website and/or PSL Application. Except as disclosed in this Privacy Policy or as otherwise authorized by you, we will never share your Personal Information with third parties for their marketing purposes. Your trust and confidence are our highest priority.

### **2. DEFINITIONS**

As used in these Terms, the following terms shall have the meaning set forth below:

- (i) **“Contest(s)”** includes the Practise contests where Participants can play the games without using any PSL coins and do not receive any cash prizes and Paid Contests where participants have to use PSL Coins to enter the Contest and win cash prizes.
- (ii) **"Effective Date"** means the Date on which You accept the Privacy Policy and Terms by clicking 'Sign Up' or 'I Accept'.
- (iii) **“Participant”** means a Registered User who is eligible to participate in the Contests. It does not include Registered Users who are physically located outside India and having age below 13 Years.
- (iv) **“Registered User”** means any person who signs up and registers as a user by creating an Account on through the PSL Website and/or PSL Application.
- (v) **"Registered User Information"** means information regarding Registered Users which includes information pertaining to name, age, legal status and address of the Registered User, and other information either posted, uploaded, shared on the PSL Website and/or PSL Application;
- (vi) All other capitalized terms shall have the meaning ascribed to them in the Other Terms.

### 3. INFORMATION WE COLLECT

- (i) We receive and store Personal Information (i.e. includes information that whether on its own or in combination with other information may be used to readily identify or contact you such as: name, age, address, email address, phone number etc.) and Non-Personal information provided by you when you set up an account upon registration (Account) or link your Facebook and/or Google account with the PSL Website and/or PSL Application. The Information provided by you, for the purposes of this Privacy Policy, may include, but are not limited to: (i) first and last name; (ii) a home or other physical address; (iii) an email address or other contact information including mobile / landline numbers; (iv) other personal information could include Permanent Account Number.; (v) demographic information (e.g., gender, age, education, country of residence, and other information relevant to user surveys and/or offers ) and (vi) information you post in your Profile, wants, or feedback, and any comments or discussions you post in any blog, chat room, or other correspondence on the PSL Platform, as well as on Facebook if you link your Account with your Facebook account and (vii) payment information such as credit card information, bank details etc. from you. You always have the option to not provide information by choosing not to use a particular service or feature. Importantly, we only collect Personal Information about you that we consider necessary for achieving this purpose and communicating with you about the services being offered.

**By continuing to use the PSL Website and/or PSL Application you are deemed to have read the Privacy Policy and understood the purpose for which your Personal or Non-Personal Information is being collected and how the same shall be used and granting your express consent to such purpose and use. If, at a later date, you wish to withdraw this consent, please send us an email at support@thinkquant.in.**

- (ii) **Information Collected Automatically:** When you use the PSL Website and/or PSL Application, we automatically receive and record information on our server logs from your browser or mobile, including but not limited to your hardware model, operating system version, unique device identifiers, and mobile network information including phone number, location, URL that you just came from (whether this URL is on our Website or not), which URL you next go to (whether this URL is on our Website or not), your computer browser information, IP address and cookie information. We treat this data as Non-Personal Information, except where we are required to do otherwise under applicable law.
- (iii) **Data Collection Devices:** We use data collection devices such as "cookies" on certain pages of the PSL Website and/or PSL Application to help analyze our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on the browser of your computer that assist us in providing our service. We offer certain features that are only available through the use of a "cookie". We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. Most cookies are "session cookies," meaning that they are automatically deleted from your browser at the end of a session. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the PSL Website and/or PSL Application and you may be required to reenter your password more frequently during a session.

#### 4. USE OF INFORMATION COLLECTED

Personal Information about Registered Users is an integral part of our business. We neither rent nor sell your Personal Information to anyone. We may share your Personal Information only as described in this Privacy Policy and related documents.

##### (i) **Use of Personal Information:**

We will use and store Personal Information to deliver services to you, including enabling you to participate in Contests, to win Prize Money, access other services and features available, verifying your identity and eligibility to participate in Contests, and to otherwise enable you to use the PSL Website, PSL Application and services; to maintain, and improve our services, including, for example, to facilitate payments, provide services you request (and send related information), develop new features, provide customer support to Registered Users, develop safety features, authenticate users, and send updates and administrative messages, to market the services, new Contests and for the internal operational and administrative purposes, receiving payments, including sharing with third party payment gateways in connection with use of the PSL Platform and services offered thereunder. If you post correspondence, or third parties send us correspondence about your activities or postings on the PSL Website or PSL Application we may collect such information into a file specific to you. You agree that we may use Personal Information about you to improve our marketing and promotional efforts, to analyze PSL Website and PSL Application usage, improve the content, Contests and service offerings, and customize the PSL Website and PSL Application content, layout, and services. These uses improve the PSL Website and PSL Application and better tailor it to meet your needs, so as to provide you with a smooth, efficient, safe and customized experience while using the same. You agree that we may use your Personal Information in the file we maintain about you, and other information we obtain from your current and past activities to: resolve disputes; troubleshoot problems;; measure consumer interest in the services provided by us; inform you about online and offline

offers, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our Terms of Use; and as otherwise described to you at the time of collection.

- (ii) **Aggregate Information:** We will also use Personal Information and non-personally identifiable information and other information (including information from online and offline third party sources) to create aggregated data for analytical and other purposes. We use this information to do internal research on your demographics, interests, and behavior to better understand, protect and serve You. This information is compiled and analyzed on an aggregated basis. Unless otherwise stated in this Privacy Policy, We only use this data in aggregate form.
- (iii) **Non-personally identifiable information:** We may freely use Non Personally Identifiable Information in connection with the services and features offered through the PSL Website and PSL Application, including: to administer the services being offered thereunder, to understand how well our service is working, to market the services and other products and services, to develop aggregate, statistical information on usage of the service and to generally improve the service.
- (iv) **Email Communication/Text Messages:** If you create an account and provide your email address and phone number, we will send you administrative and promotional emails and text messages. If you wish to opt out of promotional emails or text messages, you may do so by following the "unsubscribe" instructions in the email, "optout" instructions in the text message or by editing your account settings. All Registered Users receive administrative emails and/or text messages. If you wish to opt out of administrative emails, text messages you must delete your account entirely and cease use of the Service.

## 5. OUR DISCLOSURE OF YOUR INFORMATION

We may also use your Personal Information to deliver information to you that, in some cases, are targeted to your interests, such as new services, new Contests, rewards and promotions. The following are some circumstances under which and people to whom we would share your Information with from time-to-time:

- (i) **Disclosure of Personal Information:** We do not disclose your email address, telephone number and mailing address to any third party for marketing purposes. Except as otherwise provided under this Privacy Policy, we will disclose your Personal Information to third parties only in the following limited circumstances- a) to trusted partners who work on behalf of or with us under confidentiality agreements. These entities may use your Personal Information for performing services, administering promotions, analyzing data and usage of the service through the PSL Website and PSL Application, processing online payments, operating the service, Contests or providing support and maintenance services for the same or providing customer service and b) when we have your consent to otherwise share the information.
- (ii) **Non-Personally Identifiable Information:** We may disclose other Non-Personally Identifiable Information to third party advertisers and advertising agencies, partners, and other parties in order for us and such third parties to analyze a) the performance of, to operate and improve the services offered through the PSL Website and PSL Application, (b) the behavior of Registered Users and to target offers to Registered Users depending upon their requirements and (c) to offer more Contests based on the preference or choice of Participants. These third parties are subject to confidentiality agreements with us and other legal restrictions that prohibit their use of the information we provide them for any other purpose except to

facilitate the specific outsourced operation, unless you have explicitly agreed or given your prior permission to them for additional uses.

- (iii) **Aggregate Information:** Because the aggregate information we collect does not specifically identify you, it may be shared with any number of parties. For example, we may disclose anonymous, aggregated information to third parties such as potential business partners, end users, service providers, advertisers, and funding sources, in order to describe our business and operations.
- (iv) **Network Operators:** Use of the service provided through the PSL Website and PSL Application may involve use of the services of third party telecommunications carriers and service providers (such as the services of the carrier that provides cell phone service to you). Such carriers and service providers are not our contractors, and any information that a carrier collects in connection with your use of the service provided through the PSL Website and/or PSL Application is not "Personal Information" and is not subject to this Privacy Policy. We are not responsible for the acts or omissions of telecommunications carriers or service providers.
- (v) **Additional Disclosures:** Notwithstanding anything to the contrary in this Privacy Policy, We reserve the right to use or disclose Personal Information and any other information we collect in connection with the service offered through the PSL Website and/or PSL Application a) to any successor to our business, including as a result of any merger, acquisition, asset sale or similar transaction, b) to any corporate affiliate of ours whose privacy practices are substantially similar to ours, c) to any law enforcement, judicial authority, governmental or regulatory authority, to the extent required by law or legal process, or d) if in our reasonable discretion, such use or disclosure is necessary to enforce or protect our legal rights or to protect third parties.

## 6. ACCESS OR CHANGE YOUR PERSONAL INFORMATION

You may review, correct, update or change your Account information at any time. To protect your privacy and security, we will verify your identity before granting access or making changes to your Personal Information. Your user ID and password are required in order to access your Account.

## 7. OTHER WEBSITES

PSL Website and/or PSL Application may contain links to other websites. Please note that when you click on one of these links, you are entering another website/application over which we have no control and will bear no responsibility. Often these websites/applications require you to enter your Personal Information. We encourage you to read the privacy statements on all such websites/application as their policies may differ from ours. You agree that we shall not be liable for any breach of your privacy of Personal Information or loss incurred by your use of these websites /application. We are not responsible for the privacy policies and/or practices on other sites. This Privacy Policy only governs information collected by us.

## **8. ACCOUNT DELETION**

Should you ever decide to delete your Account, you may do so by clicking on the "delete account" link on your account settings page or deleting the PSL Application. If you terminate your Account, your profile, including your check-in history and any promotional offers you received, will be removed from the PSL Website and/or PSL Application and deleted from our servers. Because of the way we maintain our PSL Website and/or PSL Application, such deletion may not be immediate, and residual copies of your profile information or posts may remain on backup media for up to ninety (90) days.

Even after you remove information from your Account or profile, copies of that information may remain viewable elsewhere, to the extent it has been shared with others, it was otherwise distributed pursuant to your privacy settings, or it was copied or stored by other users. Removed and deleted information may remain on backup media for up to ninety (90) days prior to being deleted from our servers.

## **9. AMENDMENTS TO THE PRIVACY POLICY**

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we decide to change our Privacy Policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. Any changes to our Privacy Policy will be communicated through our PSL Website and/or PSL Application. Registered Users are bound by any changes to the Privacy Policy when they continue to use the PSL Website and/or PSL Application after such changes have been first posted.

## **10. ACCOUNT INFORMATION**

You may correct your account information at any time by logging into your Account. You are entirely responsible for providing true and correct information on the PSL Website and/or PSL Application and for updating the same.

## **11. SECURITY OF PERSONAL INFORMATION**

We take reasonable security measures and procedures, and as specified by applicable law, to maintain appropriate physical, technical and administrative security to help prevent loss, misuse, or unauthorized access, disclosure or modification of Personal Information. While we take these reasonable efforts to safeguard your personal information, you acknowledge and agree that no system or transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for the unauthorized use of your information or for any lost, stolen, compromised passwords, or for any activity on your Account via unauthorized password activity.

## **12. CONTACT US**

If you have any questions about this Privacy Policy or the privacy practices of the PSL Website or PSL Application you can contact us at [support@thinkquant.in](mailto:support@thinkquant.in). We will make every effort to resolve your concerns.

## **13. GRIEVANCE OFFICER**

In accordance with Information Technology Act 2008 and rules made there under, in case of grievances you can contact:

[Think Quant Solutions Pvt. Ltd.]

[support@thinkquant.in](mailto:support@thinkquant.in)

In the event you wish to make grievances regarding any violation of the provisions of the Privacy Policy, you may send a written complaint to the Grievance Officer, who shall redress the complaint within one (1) month.

Last updated: 09<sup>th</sup> August 2018

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