# aaboRing Privacy Policy

**1008** Digital Health Pvt. Ltd. (aabo), we respect the privacy of our users. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our mobile application, use Ring or when we provide services. Our products, like the aaboRing, enable you to track your lifestyle choices and the quality of your sleep. We understand that data does not get much more personal than this, and the protection of your personal data is of paramount importance to us. Please take a moment to carefully review this statement. Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Application, including any in-game virtual items, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

#### **COLLECTION OF YOUR INFORMATION**

We may collect information about you in a variety of ways. The information we may collect and process, such as to provide you with services when you visit our website, make purchases on our Site, and use your ring and app. It depends on the content and materials you use, and includes: through the headings below,

#### • Device & Application Users

aabo collects and processes the personal data of Device & Application Users ("Users") for the following major purposes:

#### To provide aaboRing services

We process personal data to provide aaboRing services and app features, such as to provide you with daily insights about your readiness and sleep.

#### • To provide customer service

We process personal data for the purpose of providing customer service and managing our customer communication. If you contact our support with questions regarding your app data, we may use the provided information to answer your questions and for solving any issues you may have.

## • To develop our products and services

We process data regarding your use of the aaboRing and platform to improve our services and features, such as in the aaboRing app. When possible, we will do this using only pseudonymized, aggregated, or non-personally identifiable data.

#### To market our products and services

We process marketing-related data to provide online advertising and aabo marketing communications. For example, as explained more fully in our Cookie Policy, we use cookies on our website in order to create targeted audiences for online advertisement. You can always opt out of marketing communications, and we will only send you our newsletter if you have requested it.

# • To enable third party integrations

We process data to provide Users who request that we share their data with certain third parties, such as research partners. This is only done with your express consent.

# • To comply with statutory obligations

In certain cases, we must process certain data when it is required by applicable laws and regulations. Such statutory obligations are related, for example, to accounting and tax requirements, legal claims, or other legal purposes.

aabo processes the following personal data categories about device and application Users:

#### **Personal Data**

Demographic and other personally identifiable information (such as your name and email address) that you voluntarily give to us when choosing to participate in various activities related to the Application, such as chat, posting messages in comment sections or in our forums, liking posts, sending feedback, and responding to surveys. aabo collects age, gender, height & weight data to which would be used for personalized counselling to suggest diet plans, ideal sleep norms and other body vital thresholds. Height and weight help to derive BMI which is useful to determine fitness and wellness practices. If you choose to share data about yourself via your profile, online chat, or other interactive areas of the Application, please be advised that all data you disclose in these areas is public and your data will be accessible to anyone who accesses the Application.

#### **Derivative Data**

Information our servers automatically collect when you access the Application, such as your native actions that are integral to the Application, including liking, re-blogging, or replying to a post, as well as other interactions with the Application and other users via server log files.

# Financial Data: Not applicable for aaboRing app.

There is no payment necessary for this Application. Financial information, such as data related to your payment method is for this application Not Applicable. However you shall make payment for any services thru payment gateway and for that we do not access any of your financial data.

#### **Data from Social Networks**

User information from social networking sites, such as [Apple's Game Center, Facebook, Google+ Instagram, Pinterest, Twitter], including your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks. This information may also include the contact information of anyone you invite to use and/or join the Application.

# **Geo-Location Information**

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the Application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

#### **Mobile Device Access**

We may request access or permission to certain features from your mobile device, including your mobile device's storage. If you wish to change our access or permissions, you may do so in your device's settings. Some of app functions shall not work if there is no mobile device access.

#### **Mobile Device Data**

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.

### **Push Notifications**

We need to send you push notifications regarding your account or the Application.

### **Third-Party Data**

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Application permission to access this information.

#### **Data From Contests, Giveaways, and Surveys**

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

#### **USE OF YOUR INFORMATION**

In most cases, aabo collects personal data directly from you, such as when you register for an account or use your ring to collect measurement data via the tracking functions of aabo ring. We may also process data that is produced from the information you provide to us, such as,

- 1. Contact information such as email address or physical address.
- 2. Create and manage your account
- 3. Compile anonymous statistical data and analysis for use internally.
- 4. User information such as gender, height and weight, User ID, and other information you may provide to us about yourself or your account.
- 5. Device information such as IP address and location data.
- 6. User context information such as notes and tags.
- 7. Measurement data such as heart rate, movement data, and temperature data.
- 8. Calculated user sleep data such as sleep phases (deep, light, REM, awake), readiness level, body mass index (calculated based on height and weight).
- 9. Email/Text Message/WhatsApp Message you regarding your account or order.
- 10. Increase the efficiency and operation of the Application.
- 11. Request feedback and contact you about your use of the Application.
- 12. Resolve disputes and troubleshoot problems.
- 13. Send you a newsletter.
- 14. Solicit support for the Application.
- 15. Administer sweepstakes, promotions, and contests.
- 16. Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the Application to you.
- 17. Fulfill and manage purchases, orders, payments, and other transactions related to the Application.
- 18. Generate a personal profile about you to make future visits to the Application more personalized and offer curated counselling for health and wellness as desired. Other parameters such as weight, height, age, gender help to suggest to set thresholds as they influence individual needs.
- 19. monitor and analyze usage and trends to improve your experience with the Application.
- 20. Notify you of updates to the Application
- 21. Offer new products, services, mobile applications, and/or recommendations to you.
- 22. Process payments and refunds.
- 23. Respond to product and customer service requests
- 24. Please note that some of the personal data we process, including any data concerning your health, is considered special or sensitive personal data. Under applicable law, such data is processed only if you have given your consent for processing. If you access or use any of aaboRing's location-based services, such as by enabling GPS-based activity tracking through your app, aaboRing may process the approximate or precise location of your device while the service is active. This data may be obtained via your device's service provider network ID, GPS, and/or Wi-Fi data. aabo does not process such location data without first obtaining your consent. You may disable such location processing at any time using your device's location permission settings.

## **Personal Data Sharing**

aabo does not sell or rent your personal information, and only shares your personal data with certain trusted service providers so that we can provide you with our services and operate our business. Whenever we share data with third-party service providers, we require that they use your information only for the purposes we've authorized, and for the limited reasons explained in this Privacy Statement. We also require these service providers to protect your personal information to at least the same standards that we do.

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

# By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

#### **Third-Party Service Providers**

We may share your information with third parties that perform services for us or on our behalf, including health data processing, writing algorithms, provide health counselling, provide diet planning, recommend treatments and other functions such as payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

## **Marketing Communications**

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

### **Interactions with Other Users**

If you interact with other users of the Application, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.

### **Online Postings**

When you post comments, contributions or other content to the Applications, your posts may be viewed by all users and may be publicly distributed outside the Application in perpetuity.

### **Third-Party Advertisers**

We may use third-party advertising companies to serve ads when you visit the Application. These companies may use information about your visits to the Application and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

# **Affiliates**

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

#### **Business Partners**

We may share your information with our business partners to offer you certain products, services or promotions.

#### **Social Media Contacts**

If you connect to the Application through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

#### **Other Third Parties**

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

#### Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

## SAFEGUARDING YOUR DATA

aabo uses technical and organizational safeguards to keep your data safe and secure. Where appropriate, these safeguards include measures such as anonymization or pseudonymization of personal data, strict access control, and the use of encryption to protect the data we process.

We also ensure that our staff receives adequate training to ensure personal data is processed only in accordance with our internal policies, consistent with our obligations under applicable law. We also limit access to your sensitive personal data to personnel that have specifically been granted such access.

We update the aaboRing app and the ring firmware regularly. We recommend that you make sure that you always have the latest app and firmware versions installed in order to maximize protection of your data.

#### **DATA RETENTION**

The retention period for your personal data generally depends on the duration of your aaboRing account lifecycle. Your personal data will be deleted when it is no longer needed for the purpose it was originally collected, unless we have a legal obligation to retain data for a longer period of time. For example, your measurement data regarding your sleep and readiness is stored only so long as your aaboRing account is active.

aabo also has legal obligations to retain certain personal data for a specific period of time, such as for tax purposes. These required retention periods may include, for example, accounting and tax requirements, legal claims, or for any other legal purposes. Please note that obligatory retention periods for personal data vary based on the relevant law.

If you wish, you may request deletion of your aaboRing account by contacting info@aabo.in

#### TRACKING TECHNOLOGIES

### **Cookies and Web Beacons**

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Application to help customize the Application and improve your experience. When you access the Application, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the Application. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

### **Internet-Based Advertising**

Additionally, we may use third-party software to serve ads on the Application, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us. For more information about opting-out of interest-based ads, visit the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

## **Website Analytics**

We may also partner with selected third-party vendors, {such as [Adobe Analytics,] [Clicktale,] [Clicky,] [Cloudfare,] [Crazy Egg,] [Flurry Analytics,] [Google Analytics,] [Heap Analytics,] [Inspectlet,] [Kissmetrics,] [Mixpanel,] [Piwik,] and others], to allow tracking technologies and remarketing services on the Application through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Application, determine the popularity of certain content, and better understand online activity. By accessing the Application, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can install and/or update your settings for one of the following:

[Adobe Privacy Choices Page]

[Clicktale Opt-Out Feature]

[Crazy Egg Opt-Out Feature]

Digital Advertising Alliance Opt-Out Tool

[Flurry Analytics Yahoo Opt-Out Manager]

[Google Analytics Opt-Out Plugin]

[Google Ads Settings Page]

[Inspectlet Opt-Out Cookie]

[Kissmetrics Opt-Out Feature]

[Mixpanel Opt-Out Cookie]

Network Advertising Initiative Opt-Out Tool

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

#### **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

# **CHANGES TO THIS PRIVACY NOTICE**

This Privacy Statement is effective as of July 20, 2022. We reserve the right to update this Policy from time to time at our sole discretion, but if we do, we'll let you know about any material changes either by notifying you on the website or by sending you an email or push notification. If you keep using aaboRing services after a change, your continued use means that you accept any such changes.

# **OPTIONS REGARDING YOUR INFORMATION**

You may at any time review or change the information in your account or terminate your account by:

- Logging into your account settings and updating your account
- Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements. Emails and Communications If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

- Noting your preferences at the time you register your account with the Application
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

CONTACT US If you have questions or comments about this Privacy Policy, please contact us at: 1008 Digital Health Pvt. Ltd.,
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