

WITTY HOSTELS - PRIVACY POLICY

At WITTY HOSTELS, it's affiliates and subsidiaries (hereinafter collectively referred to as "WH", "we" or "us" or "our"), we endeavour to provide our guests outstanding services and experiences in our hostels and luxury residences around India. We value your business and your faith in us in delivering you a superior level of service.

We recognize that privacy is important to our guests, and hence our Global Privacy Policy explains our practices regarding personal information we collect when you visit or use our hostels, residences and our website, mobile applications, or other online products and services or when you fill up a form and become member of our loyalty programs. We shall protect your personal data, to keep it secure as per applicable privacy and data protection laws.

It also describes the purposes for which we collect that personal information, the other parties with whom we may share it and the measures we take to protect the security of your data. It also tells you about your rights and choices with respect to your personal information, and how you can contact us about our privacy practices.

You are advised to carefully read this Privacy Notice before using or availing any of our products and/or services.

DEFINITIONS

In this Privacy Notice, the following definitions are used:

1. Data

personal information, including sensitive personal information and special category personal data (as defined under Data Protection Laws) about you, which we collect, receive or otherwise process in connection with your use of our hostels, website and/or mobile application.

2. Cookies

a small file placed on your device by our website or mobile application when you either visit or use certain features of our website or mobile application. A cookie generally allows a website or mobile application to remember your actions or preference for a certain period of time.

3. Data Protection Laws

any applicable law for the time being in force relating to the processing of Data.

4. Partners

select third parties (including WITTY GROUP, WITTY BANQUETS, VJTF) with whom we have contracts for the businesses described in this Privacy Notice.

5. Service Providers

includes entities which provide services to WH and to whom we may disclose your Data for a specific purpose pursuant to a written contract.

The WITTY HOSTELS, (WITTY NEELKANTH PRIVATE LTD.) a company incorporated in India whose registered office is at Witty Neelkanth Pvt Ltd, 671/1 to 11, Ramchandra Lane, Malad West, Mumbai 400064.

WITTY HOSTELS

WITTY NEELKANTH PVT Limited, and its subsidiaries, affiliates, associate companies and joint venture companies.

User or you

the natural person who accesses our services, websites or mobile application.

WHAT DATA DO WE COLLECT ABOUT YOU?

WH collects Data for various purposes set out in this Privacy Notice.

This Data includes, without limitation, the following categories:

(a) Contact information: first and last name, email address, postal address, country, phone number and other similar contact data.

(b) Financial information: payment instrument information, transactions, transaction history, preferences, method, mode and manner of payment, spending pattern or trends, and other similar data.

Technical information: website, device and mobile app usage, Internet Protocol (IP) address and similar information collected via automated means, such as cookies, pixels and similar technologies. This may include the information mandated by the law enforcement agencies.

(c) Product and service information: Your account membership number, registration information, and program-specific information, when you request products and/or services directly from us or participate in marketing programs.

(d) Your reviews, feedback and opinions about our products, programmes and services.

(e) Loyalty programme information: your loyalty membership information, account details, profile or password details.

(f) Transaction information: date of the transaction, transaction amount, transaction history and related details;

(g) Other information (which may include special category personal data): Age, sex, date of birth, marital status, nationality, details of government identification documents provided, occupation, ethnicity, religion, travel history or any other personal information provided in responses to surveys or questionnaires.

HOW DO WE COLLECT DATA?

We collect Data in the following ways:

· Information You Give Us: We receive and store any information you enter on our website or mobile application or give us in any other way (e.g., at our outlets, stores, hotels, kiosks). Please see the section below, titled “Data Shared by You” for more information.

· Automatic Information we Collect: We use “cookies”, pixels and similar technologies to receive and store certain types of information whenever you interact with us. Please see the section below, titled “Data That is Collected Automatically” for more information.

- **Email Communications:** We often receive a confirmation (if your device supports such capabilities) when you open an email from us or click on a link in the email. You can choose not to receive marketing emails from us by clicking on the unsubscribe link in any marketing email.
- **Automatic Information we Collect from Other Websites:** We receive and store certain types of information when you interact with third-party websites that use our technology or with whom we have a specific agreement.
- **Information from other Sources:** We may obtain information from other sources. An example of this is when you authorise a third-party website (such as the website of another WITTY Group Entity) to interact directly with our website or mobile application to provide or receive information about you. In that case, we may receive information to identify your account with that website.
- **Information Previously Provided to WITTY Group Entities:** Where you have shared any information previously with any of the WITTY Group Entities and such WITTY Group Entity is permitted to further share such information, it will share such information with us. If such information is sensitive personal information or special category personal data, the WITTY Group Entity will only share such information with us with your consent.

You can make choices about our collection and use of your Data. For example, you may want to access, edit or remove your Data on our website or mobile application. When you are asked to provide Data, you may decline. For more information, please see the section below, titled “Your Rights and Choices”.

DATA SHARED BY YOU

WH may collect your Data in several ways from your use of our stores, website or mobile application. For instance:

- (a) when you register with us to receive our products and/or services;
- (b) when you conduct a transaction with us or attempt a transaction at our locations, on our website or mobile application;
- (c) when you complete surveys conducted by or for us;
- (d) when you elect to receive any communications (including promotional offers) from us;
- (e) from the information gathered by your visit to our stores, website or mobile application;

DATA THAT IS COLLECTED AUTOMATICALLY

(a) We automatically collect some information when you visit our website or use our mobile application. This information helps us to make improvements to our content and navigation. The information collected automatically includes your IP address.

(b) Our web servers or affiliates who provide analytics and performance enhancement services collect IP addresses, operating system details, browsing details, device details and language settings. This information is aggregated to measure the number of visits, average time spent on the site, pages viewed and similar information. WH uses this information to measure the site usage, improve content and to ensure safety and security, as well enhance performance of our website or mobile application.

(c) We may collect your Data automatically via Cookies, pixels and similar technologies in line with settings on your browser. For more information about Cookies, please see the section below, titled “Cookies, Pixels and Similar Technologies”.

OUR USE OF DATA

Data collected by us may be used by us for the following reasons:

- (a) carry out our obligations arising from any contract entered into between you and us;
- (b) provide products and/or services and communicate with you about products and/or services offered by us;
- (c) enable WITTY Group Entities and Partners to offer their products and/or services and communicate with you about such products and/or services;
- (d) process, disclose, transmit, and/or share the Data with WITTY Group Entities, and other third parties which have business or contractual dealings with us;
- (e) provide you with offers (including for financial products and/or services), personalised services and recommendations and improve your experience on our website and mobile application;
- (f) operate, evaluate and improve our business, website and mobile application;
- (g) generate aggregated data to prepare insights to enable us to understand customer behaviour, patterns and trends with a view to learning more about your preferences or other characteristics;
- (h) provide privileges and benefits to you, marketing and promotional campaigns based on your profile;
- (i) in connection with loyalty programs owned and operated by us or by other WITTY Group Entities;
- (j) communicate with you (including to respond to your requests, questions, feedback, claims or disputes) and to customise and improve our services;
- (k) enforce the terms of use of our website and mobile application;
- (l) protect against and prevent fraud, illegal activity, harm, financial loss and other legal or information security risks; and
- (m) serve other purposes for which we provide specific notice at the time of collection, and as otherwise authorised or required by applicable law.

Where required under relevant Data Protection Laws, we may need to ensure that there is a legal basis to justify our processing of your Data. There are a number of different ways that we are lawfully able to process your Data. We have set these out below.

Where processing your Data is necessary for us to carry out our obligations arising from any contracts entered into between you and us: If you enter into a contract with us in relation to any of our product or service offerings, we may process certain Data about you in order to perform our obligations under this contract, including to enable us to communicate with you about such products and/or services and to process your payment transactions.

Where processing your personal information is within our legitimate interests: We can process certain Data where it is necessary for the purposes of the legitimate interests pursued by us or

by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of yours which require protection of your Data. The ways in which we may process your Data for the purposes of our legitimate interests include:

- (a) enforcing the terms of use of our website and mobile application;
- (b) generating aggregated data to prepare insights to enable us to understand customer behaviour, patterns and trends with a view to learning more about your preferences or other characteristics;
- (c) improving our website and mobile application and ensuring that they run smoothly;
- (d) providing you with offers, personalised services and recommendations and improving your experience on our website and mobile application;
- (e) protecting against, and preventing, fraud, illegal activity, harm, financial loss and other legal or information security risks;
- (f) providing offers, privileges and benefits to you, marketing and promotional campaigns based on your profile;
- (g) communicating with you (including responding to your requests, questions, feedback, claims or disputes) and customising and improving our services;
- (h) operating, evaluating and improving our business;
- (i) enabling WITTY Group Entities and Partners to offer their products and/or services and to communicate with you about such products and/or services;
- (j) in connection with loyalty programs owned and operated by us or by other WITTY Group Entities; and
- (k) processing, disclosing, transmitting, and/or sharing the Data with WITTY Group Entities, and other third parties which have business or contractual dealings with us.

Where you give us your opt-in consent to process your personal information: In certain circumstances, where required under relevant Data Protection Laws, we will seek to obtain your consent before we undertake certain processing activities with your Data.

Where required under relevant Data Protection Laws (e.g. under direct marketing legislation), we will obtain your opt-in consent prior to sharing your Data with third parties and carrying out certain marketing activities (unless we are permitted by relevant Data Protection Laws to contact you without your opt-in consent in relation to goods and services which are similar to those which you have already purchased, used or interacted with).

You have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found in the section below, titled "Your Rights and Choices".

Where processing your personal information is necessary for our compliance with a legal obligation: In certain circumstances, we may disclose your Data for the purposes of compliance with a legal obligation (for example, to comply with a law, regulation or compulsory legal request). We do not think that any of the above activities prejudice you in any way. However, you do have the right to object to us processing your personal information in certain circumstances. If you would like to know more about these circumstances and how to object to our processing activities, please see the section below, titled "Your Rights and Choices".

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your Data.

Further, where required under relevant Data Protection Laws, we will only process special category personal data' (as defined under Data Protection Laws) if there is a valid legal basis, which might involve obtaining your explicit consent.

Where we use or share your Data on behalf of another entity (i.e., the controller) as part of our services offered to that entity, we do so under the instructions of that entity and that entity is responsible for ensuring that there is a legal basis for us to use or share your Data on its behalf (if such legal basis is required under relevant Data Protection Laws).

MINORS

Our website and mobile application do not offer products or services for use by minors. If you are under 18, you may use our website or mobile application only with the involvement of a parent or guardian.

SHARING OF DATA

We may share your Data in the following ways (and for the purposes of relevant Data Protection Laws, we may do so either as a controller in our own right or as a processor on behalf of and under the instructions of another entity in accordance with our obligations under our agreement with that entity):

(a) Partners: We may make available to you services, products, or applications provided by Partners for use on or through our website or mobile application. If you choose to use such services, products or applications, Data related to these uses may be shared with such Partner.

Such Partners use your Data for the purposes of providing their own products or services to you. Their use of your Data is subject to their own privacy policies. For further information on how these Partners process your Data, please refer to their privacy policies.

(b) WITTY Group Entities: We may share your Data with WITTY Group Entities for them to make their products, services and /or applications available to you, to assist them in reaching out to you in relation to their programs or campaigns and to process your queries and requests. We may also share your Data with the WITTY Group Entities as is relevant for the purposes set out in Clause 6 above, and to facilitate the operation of our business. Their use of your Data is subject to their own privacy policies. For further information on how these WITTY Group Entities process your Data, please review their privacy policies

(C) Service Providers: We may share your Data with Service Providers who may, in the course of providing their respective services, receive and process Data. Examples include storing and analysing Data, protecting and securing our systems, providing search results and links, providing customer service, credit analysis, processing your Data for profiling, user analysis and payment processing.

These Service Providers will be required to only process Data in accordance with our instructions. The Service Providers will also be required to safeguard the security and confidentiality of the Data they process by implementing appropriate technical and organisational security measures.

(d) Protecting WH: We may release Data when we believe that disclosure is reasonably necessary (a) to comply with a law, regulation or compulsory legal request; (b) to protect WH

or a Witty Group Entity's intellectual property rights; (c) to protect WH against harm or financial loss; (d) when we believe disclosure is necessary to protect individuals' vital interests, or (e) in connection with an investigation of suspected or actual fraudulent or illegal activity. This may include exchanging information with other companies and organisations for fraud protection, risk management and dispute resolution.

(e) Business Transfers: As we continue to develop our business, we might sell or buy subsidiaries or business units. Your Data (including in relation to loyalty programs) may be transferred as part of such transactions.

(f) Third Parties: We may also share your Data with other third parties where:

a) You request or authorise us to do so;

b) We need to comply with applicable law or respond to valid legal process; or

c) We need to operate and maintain the security of our website or mobile application, including to prevent or stop an attack on our computer systems or networks.

The sharing of your Data will be in line with the processes set out in this Privacy Notice.

KEEPING DATA SECURE

We will use technical and organisational measures to safeguard your Data and we store your Data on secure servers. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us by email.

RETENTION OF DATA

WH retains Data for as long as necessary for the use of our products and/or services or to provide access to and use of our website or mobile application, or for other essential purposes such as complying with our legal obligations, resolving disputes, enforcing our agreements and as long as processing and retaining your Data is necessary for our legitimate interests. Because these needs can vary for different data types and purposes, actual retention periods can vary significantly.

Even if we delete your Data, including on account of exercise of your right under Clause 12 below, it may persist on backup or archival media for audit, legal, tax or regulatory purposes.

WHERE WE STORE DATA

We may transfer your Data to recipients in India, where we are headquartered, and other countries. These countries may not have the same data protection laws as the country in which you initially provided the information. If we transfer your Data to other countries, we will protect that information as described in this Privacy Notice, as disclosed to you at the time of data collection or as described in our program-specific privacy notice.

YOUR RIGHTS AND CHOICES

Depending on which country's laws are applicable to you, you may have various rights in relation to the Data that we hold about you. To get in touch with us about any of your rights under Data Protection Laws, please use the contact details set in the section below, titled "How to Contact Us". We will seek to deal with your request without undue delay, and in any event, within any time limits provided for in Data Protection Laws (subject to any extensions to which

we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise. Where we are legally permitted to do so, we may refuse your request.

You may be entitled to the following rights in relation to your Data:

- a) Right to Confirmation and Access – you may ask us to confirm what Data we hold about you at any time, and request us to modify, update or delete such Data. You may also request a copy of the Data we hold about you.
- b) Right to Rectification – you have the right to request that we rectify any inaccurate or incomplete Data that we hold about you, including by means of providing a supplementary statement.
- c) Right to Erasure – you have the right to request that we "erase" your Data in certain circumstances.
- d) Right to Restrict Our Use of your Data – you have the right to request that we restrict our processing of your Data in certain circumstances, for example if you dispute the accuracy of the Data that we hold about you or you object to our processing of your Data (including where we process your Data for our legitimate interests, where permitted under applicable law).
- e) Right to Object – this right enables you to object to us processing your Data where we do so for certain reasons.
- f) Right to Data Portability – you have the right to request that we transfer your Data to another third party. This right of data portability only applies to certain types of Data.
- g) Right to Withdraw Consent – where we have obtained your consent to process your Data for certain activities, you may withdraw this consent at any time and we will cease to carry out that particular activity that you previously consented to unless we consider that there is an alternative legal basis to justify our continued processing of your Data for this purpose.
- h) Right to File Complaints – you have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction.

To get in touch with us about these rights, or for more information about managing your Data and promotional communications, please use the contact details set out in the section below, titled "How to Contact Us".

It is important that the Data we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold it.

PROCESSING YOUR DATA

We take steps to ensure that your Data is processed according to the provisions of this Privacy Notice and the requirements of applicable law.

To ensure that your Data receives an adequate level of protection, we have put in place appropriate written contracts with WITTY Group Entities, Partners and Service Providers that we share your Data with.

SEVERABILITY

If any court or competent authority finds that any provision of this Privacy Notice (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Notice will not be affected.

COOKIES, PIXELS AND SIMILAR TECHNOLOGIES

Our website and mobile application may place and access certain Cookies on your device. Cookies are unique identifiers that we transfer to your device to enable our systems to recognize your device. We also use pixels and similar technologies to analyse traffic on our website and mobile application to improve your experience of using them.

When you first visit our website and mobile application, you will be presented with a pop-up screen informing you of our use of Cookies and asking you to provide your consent for such use. The pop-up screen may not reappear for all your subsequent visits to our website and mobile application. You may adjust your web browser software if you do not wish to receive Cookies or web beacons, but this may prevent you from taking advantage of some of the features of our website and mobile application. Please refer to your browser instructions or 'help' pages to learn more about these functions. Select third parties (including WITTY Group Entities) with whom we have contracts for the businesses described in this Privacy Notice.

CHANGES TO THIS PRIVACY NOTICE

Our business changes constantly and therefore our Privacy Notices may also change. We may email periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our website and mobile application frequently to see recent changes. The updated version will be effective as soon as it is accessible. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

HOW TO CONTACT US

To request to review, update, or delete your personal information or to otherwise reach us, please submit a request by emailing us at **admin@wittyhostels.com**. You may contact us for information on Service Providers, Partners and WITTY Group Entities with whom we may share your Data in compliance with this Privacy Notice and applicable law. We will respond to your request within 30 days.

GRIEVANCE OFFICER

Please see below the details of our grievance officer:

Email: legal@wittyhostels.com

Address: WITTY NEELKANTH, Ramachandra Lane, Malad West, Mumbai 400064