

# HAPPENZO PRIVACY POLICY

As updated on 5<sup>th</sup> January, 2024.

This document explains how HAPPENZO (“**Happenzo**”, “**we**”, “**our**” and “**us**”) – a venture owned and operated by Rightangle Technologies Private Limited having registered office at *B-12 #553, Abhinav Complex, Vasundhara Enclave New Delhi*, collects, processes, stores, and/or shares any Personal Information (as defined below) and/or other information from or about the Users. WE VALUE OUR USERS’ PRIVACY AND SO WE HAVE PREPARED THIS PRIVACY POLICY DOCUMENT TO DEMONSTRATE OUR PROCEDURES IN RELATION TO PERSONAL INFORMATION. By accessing and/or using the Platform, you consent to the collection, storage, disclosure, and other uses of your information per this Privacy Policy. As mentioned in the general terms set out hereinbelow, you must be at least of legal age to access the Platform and/or use the Services. PLEASE CAREFULLY READ THIS DOCUMENT BEFORE SUBMITTING ANY INFORMATION ON THE PLATFORM. We may update this Privacy Policy from time to time by publishing a revised version on the Platform and in order to comply with the Applicable Law. Please check this Privacy Policy document each time before you share Personal Information with us. HAPPENZO may share the information (including your Personal Information) with our Affiliates, employees, directors, agents, contractors, business partners, data processors and our successors or permitted assigns or any third-party service provider, **who are engaged in providing and supporting your access to the Platform and/or Services**, and by registering on the Platform and/or for our Services, you provide your express consent to us that we may collect, store, share, transmit or otherwise use your information necessary for providing Services (including Personal Information) as per this Privacy Policy in particular and these terms in general. HAPPENZO, as per this policy will not share your information (including personal information), with any outside party who is not covered under the definition above. **You, the User have a right to revoke his/her consent at any given time in accordance with the terms of this Privacy Policy.**

## 1. DEFINED TERMS

- 1.1 “**Personal Information**” shall have the meaning as ascribed to under Clause 2.1;
- 1.2 “**Purpose**” shall have the meaning as ascribed to under Clause 2.2;

- 1.3 **"Services"** shall mean to provide planning and guest engagement services for events, including not limited to, weddings, social functions, group activities, events and further providing offline ground services including equipment and human resource rentals as may be required for the event organization;
- 1.4 Any capitalized terms in this Privacy Policy not defined hereinunder shall have the meaning assigned under the Terms and Conditions of HAPPENZO.

## 2. **NOTICE**

The Users are hereby informed in accordance with the Applicable Law that the Personal Information (defined) of the Users shall be collected by HAPPENZO and further informs the Users of the Purpose (defined) for which such Personal Information is collected hereinbelow:

- 2.1 **Description of Personal Data:** The Users are informed that HAPPENZO shall collect the following information to identify you, further, the list shall be suitably amended from time to time and the Users shall be duly informed of any such amendment:

- 2.1.1 Name;
- 2.1.2 Email Address;
- 2.1.3 Age;
- 2.1.4 Gender; and
- 2.1.5 Phone number.

(Collectively, referred to as "**Personal Information**")

- 2.2 **Purpose:** HAPPENZO does not disclose or sell the Personal Information without your consent unless we are obliged to do so as set out below. You agree that HAPPENZO and/or any third party, engaged by HAPPENZO to provide Services as stipulated under the Terms and Conditions of the Platform, shall have the right to use the Personal Information provided by you to HAPPENZO, for the following purposes:

- 2.2.1 to provide Services (defined) to you;

- 2.2.2 contacting you for any customer support, if required;
  - 2.2.3 connecting you with other third parties, if required to fulfil your requirement of Services on our Platform.
  - 2.2.4 sending you updates or information about the Platform and/or Services;
  - 2.2.5 managing your account and relationship with the Platform and/or Services, and improving your experience when you use it;
  - 2.2.6 improving the Services, research, surveying, and engaging with you, for example by sending you communications for these purposes;
  - 2.2.7 marketing and promotion of the Platform and/or Services;
  - 2.2.8 personalizing and optimizing the Platform and/or Services;
  - 2.2.9 sharing promotional content and/or advertising; and
  - 2.2.10 creating reports, analysis, or similar services for research or business intelligence.
- (Collectively, referred to as “**Purpose**”.)

### 3. **COLLECTION**

- 3.1 **Personal Information:** In order to help you get the most out of our Services, we collect Personal Information when you use the Platform by creating an account or register with us. Personal Information includes your name, Email address, age, gender and phone number, and any other personally identifiable information that may be added to the list of description under Clause 2.1. We may collect and store all of the queries, comments, communications, and chats you post, transmit or generate on the Platform and/or through the Services for purpose of providing you a better and quality Services as per your requirement. We ask Users only to submit the minimum amount of information necessary to use our Services. We may also gather non-Personal Information when you use the Platform. Such data is compiled in aggregate and includes things like the referring URL and the type of browser you may be using to access the Platform. This data is used to better understand and enhance the User experience on the Platform. Happenzo may publish these statistics or share them with third parties without including Personal Information only when you consent to the same.
- 3.2 User generated Content posted on the Platform may be viewed by the general public. Accordingly, HAPPENZO cannot ensure the privacy of any Personal Information included in such User generated Content.

3.3 **Cookies:** HAPPENZO may employ cookies to track your access to the Platform and/or Services. These technologies operate either by placing a small file that stores some information on your computer or mobile device; and/or by accessing the information on your device. HAPPENZO uses cookies and similar technologies to recognize your device, for example by identifying your IP address, and to collect data such as your device's model, operating system and screen size, other applications installed on your device, time and date, and other information about how you use the Platform and/or Services. To enable HAPPENZO to provide you with more customized and quality services, and to collect other information about your use of our Services. By continuing the use of the Platform, you are agreeing to our use of cookies. If you do not agree to our use of cookies, you can block them in your browser setting, but you may lose some functionality on the Platform.

#### 4. **HAPPENZO'S USE AND DISCLOSURE OF INFORMATION**

##### 4.1 **Use of information:**

HAPPENZO collects and uses the Personal Information for the Purpose as stated under Clause 2.2. Furthermore, if you are a guardian of a "minor" then in that event the compliance to the Applicable Law should be adhered to and HAPPENZO reserves the legal rights to insert necessary protocols / check mechanism to enforce the foregoing including but not limited to the guardian's consent, if required under the Applicable Law.

##### 4.2 **Other Disclosures:**

4.2.1 HAPPENZO's servers and other IT infrastructure are located in India and HAPPENZO does not transfer any information including, Personal Information for processing to any location outside India in any manner whatsoever.

4.2.2 HAPPENZO may disclose Personal Information when we believe such action is necessary to comply with the Applicable Law. If HAPPENZO's control is acquired by a person(s) other than the present promoters, in the event of a change in control of

HAPPENZO's business, Personal Information may be exchanged as part of a merger, sale, or other business transfer, we may share Personal Information with such person(s), but even they will have to store and use such information in compliance with this Privacy Policy. Further, we shall have the right to disclose the Personal Information for other purposes to the extent authorized and/or required by Applicable Law. Otherwise, we do not disclose information for any other purposes, unless it has your consent.

## 5. **YOUR RIGHTS ON PERSONAL INFORMATION**

Under Applicable Laws you have the right to:

### 5.1 **Request to access your Personal Information:**

You can contact us in the manner as stipulated under Clause 11 and request access to your Personal Information. You may request HAPPENZO regarding the processing of the Personal Information, including but not limited to, summary of Personal Information that has been processed or is currently being processed, processing activities undertaken by HAPPENZO in relation to the Personal Information, the identities of the third party with which the Personal Information has been shared and the categories of the Personal Information so shared.

### 5.2 **Request correction and erasure of your Personal Information:**

You can contact us in the manner as stipulated under Clause 11 and may request amendments, corrections or request erasure of your Personal Information in the event such Personal Information inaccurate, irrelevant, outdated, incomplete or any other reason whatsoever.

### 5.3 **Right to withdraw consent:**

You may withdraw consent at any time by giving reasonable notice, unless it would frustrate the performance of a legal obligation. In this regard, you should be cognizant of the fact that the withdrawal of Personal Information may affect the ability of HAPPENZO to continue from providing you with the requested Services.

#### 5.4 **Right to Nominate**

User can nominate any other individual who shall in the event of death or incapacity of the User, exercise the rights of the User in accordance with the Applicable Law.

### 6. **SECURITY OF PERSONAL INFORMATION AND DATA PROTECTION PRACTICES**

6.1 HAPPENZO takes all reasonable and sound steps to ensure that the Personal Information is protected against misuse, loss, unauthorized access, modification, and/or disclosure. HAPPENZO adopts and applies appropriate data collection, storage, management practices, and security procedures to protect against unauthorized access, alteration, addition, deletion, disclosure, and/or destruction of a User's Personal Information, including their name, address, age, gender, password and phone number, and any other data stored on the Platform. However, no data storage or transmission over the Internet or other network can be guaranteed to be 100% secure. Accordingly, HAPPENZO does not guarantee that information will not be accessed, disclosed, altered, or destroyed by any breach of any of the abovementioned safeguards. However, we have put in place reasonable security procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. To the extent applicable, HAPPENZO complies with the Applicable Law and you (the User) are duly bound to provide all reasonable assistance and information to HAPPENZO about compliance with such laws.

6.2 Further, we have a robust grievance redressal mechanism for any issues relating to Personal Information whatsoever. In this regard, we have appointed a grievance officer to oversee compliance of HAPPENZO's Privacy Policy with the Applicable Law. If you want to exercise any of your above rights as stipulated under Clause 5 in connection to your Personal Information or if you have any queries or complaints about our Privacy Policy or how we handle your Personal Information, please contact us in the manner as specified under Clause 11 of this Privacy Policy.

## **7. External Links**

- 7.1 The Platform may contain links to third-party Platforms that are not owned or controlled by HAPPENZO. HAPPENZO does not have any control over and assumes no responsibility for, the content, privacy policies, terms of use, or practices of any third-party platforms. In addition, the HAPPENZO will not and cannot censor or edit the content of any third-party website. By using third-party Platforms, you expressly relieve HAPPENZO from any liability arising from your use of any third-party platform. Accordingly, please be advised to read the terms and conditions and privacy policy of each third-party platform that you visit, including those directed by the links contained on the Platform.
- 7.2 Further, HAPPENZO shall not be responsible for the collection, use and disclosure of information, or the privacy practices of such platforms, and we expressly disclaim any liability relating thereto.

## **8. DATA RETENTION POLICY**

We are committed to protecting and respecting your privacy and we will comply with all the Applicable Law in relation to your Personal Information. We review and update our data retention policies regularly to protect data securely in accordance with the Applicable Law and ensure that it is not deleted prematurely, either inadvertently or maliciously. Furthermore, please be ensured that HAPPENZO ceases to retain your Personal Information once the Purpose of the Personal Information is achieved or when such retention of Personal Information is no longer necessary unless it is necessary to be retained by HAPPENZO in accordance with the Applicable Law.

## **9. GENERAL TERMS**

Notwithstanding anything to the contrary in this Privacy Policy, HAPPENZO may preserve or disclose your information: (a) to the extent reasonably necessary to comply with a law, regulation, or legal request; (b) to protect the safety of any person; (c) to address fraud, security or technical issues; or (d) to protect HAPPENZO's rights or property. However, nothing in this Privacy Policy is intended to limit any legal defences

or objections that you may have to a third party, including a government's request to disclose your information. If any court or other competent authority finds any of this Privacy Policy to be invalid or unenforceable, the other terms of this Privacy Policy will not be affected.

## 10. **CHANGES TO THIS PRIVACY POLICY**

The most recent version of this Privacy Policy will govern the use of the information (including Personal Information) on the Platform. We may revise or amend this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Platform. Happenzo may also, notify you of changes to the Privacy Policy via email to the email address associated with your account. If you object to any changes to the Privacy Policy, you should immediately stop using the Platform and/or Services and close any related accounts. By continuing to access or use the Platform and/or Services after changes have become effective, you agree to be bound by the revised Privacy Policy.

## 11. **Customer Care & Grievance Mechanism:**

11.1 The User is hereby informed that in case of any queries, the User may contact the customer care, the details are mentioned below:

**contact@happenzo.com**

11.2 In the event the User has concerns / issues in relation to the Privacy Policy, the User is hereby informed that HAPPENZO aims to provide you the best experience and thereby, is fully committed to resolve all the issues faced by you within 1 (one) month from the date of receipt of the complaint.

11.3 To Address the queries/concerns of the Users, please note that we have a fully committed redressal mechanism and that your complaint shall be acknowledged with a period of 48 (forty-eight) hours and the same be resolved within a period of 1 (one) month. In this regard, kindly contact our grievance officer on the details below:

TO BE ASSIGNED.