

PRIVACY POLICY

This privacy policy applies to the entire contents of the platform “Khelo India” operated by **Sports Authority of India (“SAI”) under the aegis of Ministry of Youth Affairs and Sports, Government of India [“Khelo India”]** which may be referred to hereon in as "we" or "us" or "our" (as applicable)] including, without limitation, www.schoolfitness.kheloindia.gov.in or any application or software used to access the platform (“Website” or “mobile application” or “any other website, app, pop-up window, tab of Khelo India”).

Please read the Privacy Policy below carefully before using Khelo India. By using or registering on Khelo India, you accept and agree to the terms of this Privacy Policy. If you do not accept these terms, you are hereby advised not to access Khelo India.

The Users are responsible for ensuring their information is current and accurate. The User may update their information through the ‘My Profile’ section of the platform <https://schoolfitness.kheloindia.gov.in> , and we will use reasonable efforts to process any change the User makes; provided, however, that requests to delete information are subject to Khelo India’s internal reporting, processing and retention policies and all applicable legal obligations and existing legislations.

We at Khelo India are committed to preserving the privacy of all visitors to our platform Khelo India. We are committed to ensuring that all activities made available via the platform Khelo India will be provided in a safe and secure online environment. By accepting the Khelo India’s Privacy Policy and the Terms & Conditions at the time of registration, you expressly consent to our use and disclosure of your personal information in accordance with this Privacy Policy. This Privacy Policy is incorporated into and subject to the Khelo India’s Terms & Conditions. This Privacy Policy is effective upon acceptance in registration for new registering Users.

This Privacy Policy works in conformance to the relevant rules, amendments and notifications as promulgated by the Ministry of Communication and Information Technology, Government of India read with the prevailing sections under the Information Technology Act, 2000 (21 of 2000) read with relevant rules issued under the Information Technology Act, 2000.

Please read the following carefully to understand our views and practices regarding the User Information. The Privacy Policy can be found on our platform at <https://schoolfitness.kheloindia.gov.in>.

A. KHELO INDIA PLATFORM

The **Khelo India Platform** is an initiative by the **Sports Authority of India (“SAI”)** under the aegis of the **Ministry of Youth Affairs and Sports (“MYAS”)**, Government of India wherein SAI intends to achieve the twin objectives of broad-basing of sports and promotion of

excellence in sports as laid down under the Khelo India – National Programme for Development of Sports Scheme. The Khelo India platform is designed to provide an exhaustive and exclusive set of sporting information to the young sporting fans of the country to enable and encourage them to play more and make sports an integral part of their lives.

B. Your Privacy: Our Commitment

At Khelo India, we are committed to protect your privacy and recognise that you have a right to know about the information we access or collect about you, how your information is being used by us and what we do to protect your information. Please read the following policy to understand how your personal information shall be treated by Khelo India platform. Our commitment towards privacy and protection of User data is based on the principles of lawfulness, transparency, fairness, accuracy, data minimisation, integrity and confidentiality.

C. What does this Privacy Policy Cover?

This Privacy Policy is part of the Khelo India’s Terms & Conditions and covers the treatment of user information, including personally identifying information, obtained by Khelo India including information obtained when you access the Khelo India platform or any other software provided by Khelo India and any information that you may share through use of the Khelo India platform.

1. INTRODUCTION

1.1 Khelo India (“**Khelo India, we, us**”) recognizes that people who register on and subsequently use Khelo India’s platform (“**you**” or “**Users**” or “**Registered Users**” or “**Members**” or “**Guardians and/or Parents and/or School Principal/Teacher of Members**”) value their privacy. This Privacy Policy details important information regarding the collection, use and disclosure of User information collected on Khelo India platform, the related mobile app, and any other features, tools, materials, or other services (including affiliated services) offered from time to time by Khelo India or its affiliates. Khelo India provides this Privacy Policy to help you make an informed decision about whether to use or continue using the Service.

1.2 This Privacy Policy should be read in conjunction with our Terms & Conditions. By accessing Khelo India, you are consenting to the collection and use of information described in this Privacy Policy. The terms of this Privacy Policy apply and extends to Members and the Parents and/or Legal Guardians of Members and/or School Principal/Teacher of Members, whereas the rights ascribed to Users under this Privacy Policy extend and apply in equal measure to Members and the Parents/Legal Guardians of Members and/or School Principal/Teacher of Members.

1.3 The User’s use of Khelo India and any information the User may provide through the platform remains subject to the terms of this Privacy Policy and our Terms & Conditions, as each may be updated from time to time.

- 1.4 The User through access of Khelo India and acceptance of this Privacy Policy, hereby warrants and accepts that he/she has given his/her explicit and unequivocal consent to Khelo India for collection and processing of his/her personal information and that the said collection and processing of his/her personal information is necessary for Khelo India to fulfil their obligations for the provision of Khelo India platform to the said User and the User's participation on the said platform.
- 1.5 The User hereby accepts and agrees that the Khelo India platform shall be available and accessible only to Users situated within the territorial boundaries of the Republic of India.
- 1.6 Any questions, comments or complaints that you might have should be emailed to fitness.kheloindia@gmail.com or forwarded in writing to our address located: Khelo India IT Division, 1st Floor, SAI HQ, JLN Stadium Complex, Entry Gate No.10, Lodhi Road, New Delhi 110003.

2. COLLECTION OF INFORMATION

- 2.1 This Khelo India platform may collect personal information (personal, physical educational, location, device, interests, and other similar information) about the prospective athletes and talents ("**Members**") who have been registered on the Khelo India platform by Registered Users. The information collected by the said platform shall depend on the portion of the said platform being used by the User and may vary from time to time which will be informed through changes in this policy.
- 2.2 The terms of this Privacy Policy shall apply to the User as well as the Members including their lawful guardians and/or parents and/or school principals/teachers. The rights, obligations, duties and liabilities ascribed to the User shall also extend to the Members and their lawful guardians and/or parents and/or school principals/teachers.
- 2.3 The Khelo India platform is available to all Users, irrespective of whether they are registered and/or unregistered Users. The access and usage of the components of "Learn", "Play" and "Social" shall be an open access for all the Users, whereas the "Get Fit" (Take Test and Dashboard) component shall only be available to the registered Users.
- 2.4 The personal information provided by the Users include certain sensitive personal information of children, athletes and/or talents, which can only be provided by the Users who are the lawful guardians and/or parents and/or school principals/teachers of the concerned child, athlete and/or talent. Such Users, while adding the information of such children, athletes and/or talents shall need to specify their relationship with the child/athlete/talent and submit a declaration affirming and warranting such a relationship and the veracity of such sensitive personal information. No other third parties shall be

allowed to register Members on the Khelo India platform and provide information on the platform. SAI shall not be liable for any breach and/or non-compliance of this provision by any User and reserves all rights to initiate any legal proceedings for such a breach and/or non-compliance against the respective Users.

- 2.5 The information may be collected from the User in a number of ways which may include collecting personal information [including but not limited to Name, Password (to be created by the User), Mobile Number, Email Address, Date of Birth, Gender (Male/Female/Transgender), Preferred/Favourite Sport (optional), Locations, etc.), if the User chooses to create an account with us, thereby agreeing with the Terms and Conditions and accepting the Privacy Policy of Khelo India Platform while entering the same.
- 2.6 We may also ask the User to provide information regarding his/her Member's details on the Individual Interface [including but not limited to Name (First Name and Last Name), Date of Birth, Gender (Male/Female/Transgender), Unique ID (Aadhaar VUID + UDISE Number + Enrolment ID, Unique ID Number, Disability (if any) (optional), Email Address (optional), Phone Number (optional), Profile Picture (optional)], whereas on the School Interface the User may be asked to provide information regarding his/her Members' details [including but not limited to Name (First Name and Last Name), Date of Birth, Gender (Male/Female/Transgender), School Code, School UID, Class, Section (optional), Roll Number, Domicile (Hometown) (optional), Favourite Sports (optional), Hobbies (optional), Disabilities (In Seeing/In Hearing/In Speech/In Movement/Mental Retardation/Mental Illness/Multiple Disability/Any Other) (School Interface), Medical Profile [Blood Group + Eye Sight (Left) + Eye Sight (Right) + Medical Check-up + Date of Medical Check-up (DD/MM/YYYY) + Medical History (if any)] (School Interface)].
- 2.7 In addition to the above, we may also collect the following information whenever the User shall use and/or access the "Get Fit" vertical of the Khelo India platform in order to conduct fitness tests of the Members:
- a) Body Composition
 - b) Co-ordination
 - c) Balance
 - d) Flexibility
 - e) Cardiovascular Endurance
 - f) Strength-Core
 - g) Muscular Endurance
- 2.8 The complete profile information and usage details submitted by the User under the "Get Fit" vertical on the Khelo India platform shall be used for necessary analytics, to provide you with an enhanced and comprehensive user experience and providing prompt service recommendations from our fitness assessment service providers based upon your personal

information, usage history, etc. The complete profile information and usage details submitted by the User under the “Get Fit” vertical on the Khelo India platform shall also be used for further analytics by authorized government agencies. The User hereby unequivocally consents to the use of such information by Khelo India for the purpose stated above.

- 2.9 Any information provided by the User through the User’s posts or the User’s comments, opinions and feedback which may be uploaded on any public forum and/or review portal of the Khelo India platform may be collected by Khelo India.
- 2.10 When you use our mobile app, you hereby consent to us to access the features of your mobile device such as the phone number, dialler, your contacts, email, GPS location, Camera, Gallery, Microphone, IMEI number of your device, whether a phone call is active, the number that the phone call is connected to and the like. The access to your mobile phone device features is used to stop the radio commentary and terminate the internet access when you make or receive a call without any disruption.
- 2.11 When you use our mobile app, we also may collect mobile device information like operating system and hardware type, numbers or codes that are unique to your particular device (such as IDFA or an Android Ad ID), device information, default device language, the location of your device (at a GPS level), and app usage information. This data also may be linked to your other information, including your location data.
- 2.12 We assure you that your personal information so collected shall be protected by SAI and the Ministry of Youth Affairs and Sports, Government of India.

3. THIRD-PARTY CONTENT POLICY

- 3.1 We do not claim any ownership rights in any Third Party Content on the platform. You agree that you are solely responsible for any Third Party Content posted by you under your username.
- 3.2 You agree to pay for all royalties, fees or any other monies owed to any third party as a result of you posting any Third Party Content on the platform.
- 3.3 You acknowledge that the following constitutes (but is not limited to) prohibited Third Party Content which:
- i. is offensive, promotes racism, bigotry, hatred or physical harm of any kind against any group or individual or exploits, harasses or advocates harassment of any person;
 - ii. constitutes information that you know is false or misleading or promotes illegal activities or conduct that is abusive, threatening, obscene, defamatory or libelous;

- iii. contains nudity, excessive violence, or offensive subject matter or links to any such content;
- iv. solicits personal information from anyone under eighteen years of age;
- v. contains information that poses or creates a privacy or security risk to any person;
- vi. contains an unauthorized copy of another person's copyrighted work; and
- vii. includes a photograph or video of another person that you have posted without that person's consent.

3.4 Links to other websites: The Khelo India platform may contain links to enable you to visit other platforms of interest easily. However, once you have used these links to leave our platform, you should note that we do not have any control over that other App/website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such App/websites and such App/websites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the App/website in question.

3.5 Acceptance and Changes to Security and Privacy Policy: You acknowledge and accept that your use of the platform indicates your acceptance of the platform's Terms & Conditions and the Privacy Policy

4. USE OF INFORMATION

4.1 We may use your personal information to operate and maintain the Khelo India platform. The information may also be used to provide to you the features and functionality of the platform, including but not limited to the following:

- i. providing you with regular updates;
- ii. processing and responding to your enquiries or feedback;
- iii. personalizing your use of the platform,
- iv. alerting you to new features, special events, or certain third-party products or services in which we think you may be interested;
- v. enforcing the legal terms and conditions that govern your use of the platform;
- vi. investigating and protecting the integrity of Khelo India's platform; and
- vii. contacting you about your account or profile.

4.2 We may use your information to communicate with you about:

- i. newsletters and information for which you have signed up; and
- ii. non-marketing or administrative purposes (such as notifying you of major changes to the Khelo India platform or for customer support/feedback purposes).

- 4.3 We use your information to improve the quality and design of our platform and to create new features, promotions (if any), and functionality such as by storing, tracking, and analyzing user preferences and trends.
- 4.4 We may use your information to improve the quality and performance of our scouting systems for elite talent across the nation in order to bolster and improve India's sporting talent reservoir and deliver targeted athlete beneficial schemes and/or programmes with greater efficiency.
- 4.5 We also use cookies, log file information, and mobile app information such as device identifiers for purposes such as (a) remembering information so that you will not have to re-enter it during your visit or the next time you visit our platform; (b) providing custom, personalized content and information; (c) monitoring the effectiveness of our marketing campaigns; and (d) monitoring aggregate metrics such as total number of visitors, pages viewed, etc.
- 4.6 We may anonymize, de-identify, or aggregate your information for any legitimate business purposes, including for reporting and research. Such anonymized and/or aggregated data does not personally identify you. Sometimes, this information may be used to target more relevant content or offers to you across different devices – for instance, we may provide you with offers (if any) and content on your mobile device, based on your web-based activity.
- 4.7 We may disclose the information provided to us by the User for any other reason the User provided us with the said information.

5. DISCLOSURE OF INFORMATION

- 5.1 We may disclose the information we collect or receive from you to our affiliated agencies, other authorized government agencies, or service providers who process your information on our behalf in order to provide or operate the Khelo India platform. For instance, these entities may have access to your information for purposes including but not limited to hosting, promotional (if any) and email services, customer/feedback and technical support, and in each case, may use the information to make improvements to the services they provide to us.
- 5.2 Where you have provided your consent, we may share your personal information with selected authorized government agencies and/or government appointed aggregators for conducting analytics in conjunction with your relationship with Khelo India or as part of a specific program or feature.
- 5.3 We also may share personal information in other situations with your consent.

5.4 Khelo India also reserves the right to disclose personal information that Khelo India believes, in good faith, is appropriate or necessary to enforce our Terms and Conditions, take precautions against liability or harm, to investigate, prevent and/or respond to third-party claims or allegations, suspected illegal activities, fraud, to respond to court orders or official requests, to comply with state and federal regulations, including but not limited to sharing with appropriate tax authorities, to protect the security or integrity of our platform, to report violations of Khelo India's eligibility rules to third parties or safety of Khelo India, our users or others.

5.5 If you elect to participate in any, surveys, questionnaires, or other events during your usage of Khelo India, the rules or terms and conditions for those events may indicate that your information will be shared with third parties with your consent. You are advised to review the applicable rules and/or terms and conditions for any, surveys, questionnaires or events.

5.6 In the event control of the Khelo India platform is acquired by a new government entity and/or organization and/or government body, your information may be transferred to the new government entity and/or organization and/or government body as such a transfer may be necessary for the continued operation of the Khelo India platform. Any changes to the privacy policy by the new government entity and/or organization and/or government body shall be notified on the Khelo India platform.

5.7 SAI Aggregator's Platform & the User:

The Khelo India platform may include SAI Aggregator's links to websites or web pages. Such websites or pages are governed by their respective terms & conditions and privacy policies, which are beyond our control. Once you exit the Khelo India platform and enter the SAI Aggregator's website through the Khelo India platform, use of any information you provide shall be governed by the privacy policy of the operator of the website you are visiting. Khelo India shall not be responsible for any use of SAI Aggregator's website by such User.

6. FEEDBACK/CUSTOMER SUPPORT

6.1 All telephone and/or email conversations from the Users to our Feedback/Customer Support Centre may be recorded both to assist us in training and in quality management, and to allow for the speedy resolution of the queries.

6.2 All communications with Khelo India and its Feedback/Customer Support shall be conducted in Parliamentary language (language which is not offensive and/or abusive). Khelo India prevents and prohibits any such use of offensive and/or abusive language and strictest of actions shall be taken against the User who uses such offensive and/or abusive language including but not limited to suspension and/or termination of the User Account.

7. USER'S CHOICES

- 7.1 Khelo India will process your personal information in accordance with this Privacy Policy, and as part of that Khelo India provides you with certain choices about how we process your personal information.
- 7.2 You can access and update certain personal information Khelo India holds about you at any time by logging into your account via the platform.
- 7.3 We may occasionally send you push notifications to your mobile device. You can turn off certain push notifications in the account settings of your Khelo India Account. You can also turn off push notifications specific to our platform in the settings on your device.

8. USER & MEMBER (PARENT/LEGAL GUARDIAN) RIGHTS UNDER THIS PRIVACY POLICY:

Notwithstanding anything stated under this Privacy Policy, the rights provided to the User under this Clause 8 shall extend in equal measure to the Members and their legal guardians and/or parents as well.

8.1 Right to withdraw consent:

- i. The User shall have the right to withdraw his or her consent at any time with respect to the processing and disclosure of the personal data/information provided to Khelo India.
- ii. Such withdrawal of consent shall not affect the lawfulness of any processing/disclosure based on User consent carried on by Khelo India before its withdrawal.

8.2 Right to Transparency and Communication:

- i. Khelo India shall take appropriate measures to provide any information referred to in this Privacy Policy and any communication under this Privacy Policy relating to processing to the User in a concise, transparent, intelligible and easily accessible form, using clear and plain language. Such information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the User, the information may be provided orally, provided that the identity of the User is proven by other means.

- ii. Khelo India shall facilitate the exercise of User's rights under this Clause 8 and offer full co-operation and support towards the same.
- iii. Khelo India shall provide information on action taken on a request under this Clause 8 to the User without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Khelo India shall inform the User of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the User makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the User.
- iv. If Khelo India does not take action on the request of the User, Khelo India shall inform the User without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.
- v. Information provided under this Clause 8 and any communication and any actions taken under this Clause and Privacy Policy shall be provided free of charge. Where requests from a User are manifestly unfounded or excessive, in particular because of their repetitive character, Khelo India may either:
 - a. charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
 - b. refuse to act on the request. Khelo India shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.
- vi. Without prejudice to this Clause, where the Khelo India has reasonable doubts concerning the identity of the natural person making the request referred to herein, Khelo India may request the provision of additional information necessary to confirm the identity of the User.

8.3 Right to Information:

- i. Where personal data relating to a User are collected from the User, Khelo India shall, at the time when personal data are obtained, provide the User with all of the following information:
 - a. the identity and the contact details of Khelo India and, where applicable, of the Khelo India's representative;
 - b. the purposes of the processing for which the personal data are intended;
 - c. the recipients or categories of recipients of the personal data, if any;

- d. categories of personal data concerned;
 - e. where applicable, the fact that Khelo India intends to transfer personal data to a third party, third country or international organization.
- ii. In addition to the information referred to in Clause 8.3.1, Khelo India shall, at the time when personal data are obtained, provide the User with the following further information necessary to ensure fair and transparent processing:
 - a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. where the processing is based or would be carried out;
 - c. the existence of the User's right to request from Khelo India access to and rectification or erasure of personal data or restriction of processing concerning the User or to object to processing;
 - d. the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - e. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the User is obliged to provide the personal data and of the possible consequences of failure to provide such data.
- iii. Where Khelo India intends to further process the personal data for a purpose other than that for which the personal data were collected, Khelo India shall provide the User prior to that further processing with information on that other purpose and with any relevant further information as referred to in Clause 8.3.2.
- iv. The above stated provisions under Clauses 8.3.1, 8.3.2 and 8.3.3 shall also apply where Khelo India intends to collect information from the User.

8.4 Right to access to data:

- i. The User shall have the right to obtain from Khelo India confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
 - a. the purposes of the processing;
 - b. the categories of personal data concerned;
 - c. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - d. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- e. the existence of the right to request from Khelo India rectification or erasure of personal data or restriction of processing of personal data concerning the User or to object to such processing;
 - f. where the personal data are not collected from the User, any available information as to their source;
- ii. Where personal data are transferred to a third party, third country or to an international organisation, the User shall have the right to be informed of the appropriate safeguards implemented by Khelo India.
 - iii. Upon request by the User, Khelo India shall provide a copy of the personal data undergoing processing. For any further copies requested by the User, Khelo India may charge a reasonable fee based on administrative costs. Where the User makes the request by electronic means, and unless otherwise requested by the User, the information shall be provided in a commonly used electronic form.

8.5 Right to rectification:

The User shall have the right to obtain from Khelo India without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the User shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

8.6 Right to erasure (Right to be forgotten):

- i. The User shall have the right to obtain from Khelo India the erasure of personal data concerning him or her without undue delay and Khelo India shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 - a. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b. the User withdraws consent on which the processing is based and where there is no other legal ground for the processing;
 - c. the User objects to the processing pursuant to Clause 8.9 and there are no overriding legitimate grounds for the processing;
 - d. the personal data has been unlawfully processed;
 - e. the personal data have to be erased for compliance with a legal obligation under any law to which Khelo India is subject.
- ii. Where Khelo India has made the personal data public and is obliged pursuant to Clause 8.6.1 to erase the personal data, Khelo India, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform entities which are processing the personal data that

the User has requested the erasure by such entities of any links to, or copy or replication of, those personal data.

- iii. Sub-clauses 8.6.1 and 8.6.2 shall not apply to the extent that processing is necessary:
 - a. for exercising the right of freedom of expression and information;
 - b. for compliance with a legal obligation which requires processing by any law to which Khelo India is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in Khelo India;
 - c. For the establishment, exercise or defence of legal claims.

8.7 Right to restriction of processing:

- i. The User shall have the right to obtain from Khelo India restriction of processing where one of the following applies:
 - a. the accuracy of the personal data is contested by the User, for a period enabling Khelo India to verify the accuracy of the personal data;
 - b. the processing is unlawful and the User opposes the erasure of the personal data and requests the restriction of their use instead;
 - c. Khelo India no longer needs the personal data for the purposes of the processing, but they are required by the User for the establishment, exercise or defence of legal claims;
 - d. the User has objected to processing pursuant to Clause 8.9 pending the verification whether the legitimate grounds of Khelo India override those of the User.
- ii. Where processing has been restricted under sub Clause 8.7.1, such personal data shall, with the exception of storage, only be processed with the User's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights.

8.8 Right to data portability:

The User shall have the right to receive the personal data concerning him or her, which he or she has provided to Khelo India, in a structured, commonly used and machine-readable format and have the right to transmit those data to another entity/body without hindrance from Khelo India.

8.9 Right to object:

- i. The User shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her including profiling. Khelo India shall no longer process the personal data unless Khelo India

demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the User or for the establishment, exercise or defence of legal claims.

- ii. Where personal data are processed for direct marketing purposes, the User shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- iii. Where the User objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

9. THIRD PARTY SHARING AND ANALYTICS:

9.1 Khelo India may disclose the information it collects about the User to:

- i. to its service providers, its affiliates, and others who help provide the platform to the User;
- ii. authorized government agencies to provide analytics or to confirm/update information provided by the User;
- iii. or as otherwise authorized by the User.

9.2 We may also share the User's personal information in response to a legal order or official request; when we believe the User have acted in violation of the Terms & Conditions of Khelo India; to investigate, prevent or take action regarding suspected illegal activities, fraud or potential threats; to exercise legal rights or defend against claims; or as otherwise permitted or required by law.

9.3 We also may use or share non-personally identifiable information with third parties. Additionally, we may take personally identifiable information and de-identify it and share it in a de-identified form with service providers, its affiliates, aggregators, suppliers, and/or third parties in order to analyze and improve our platform and the User experience or for any similar purposes. It is to note that such data will not be re-identified and the contracting parties would be asked to agree to keep the data in its de-identified form after such use.

10. COOKIES:

10.1 Cookies Information: When you visit the Khelo India platform, we may send one or more cookies - small files - to your computer or other device, which may enable us or others to uniquely identify your browser. Khelo India may use both session cookies and persistent cookies. A persistent cookie remains after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser help file directions. Session cookies are

temporary and typically disappear after you close your browser. You may be able to reset your web browser to refuse all cookies or to indicate when a cookie is being sent. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, some features of the platform may not function properly if the ability to accept cookies is disabled.

10.2 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow mobile applications to respond to you as an individual. The Mobile App can alter its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

10.3 Cookies help us provide you with a better Khelo India platform, by enabling us to monitor which sections of the Khelo India platform you find useful and not useful. A cookie in no way gives us access to your computer or other device or any information about you, other than the data you choose to share with us.

10.4 We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our Khelo India platform in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

10.5 Log File Information: When you use the platform, the servers may automatically record certain information that your device sends whenever you visit any website and use certain apps. These server logs may include information such as your web or app request, Internet Protocol ("IP") address, browser type, browser language, referring/exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your request, the actions you take on a page and one or more cookies that may uniquely identify your browser.

11. DATA STORAGE

11.1 All the information collected in the database by the platform shall be stored locally on the NICS (National Informatics Centre Services Inc.) servers.

12. INFORMATION SECURITY:

12.1 We are committed to protecting the security of your personal information. Protection of the User Information, including the registration details the User provides to us, is a

priority for us. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure.

12.2 Any personal information which identifies the User will be encrypted at all times whilst in transit over the internet. The technology used by us encrypts any information sent by the User on secured pages. Our server then reads the information using a private key. This means that your information is turned into a code that can only be decoded with the private key or password.

12.3 Whilst neither we, nor any other organization, can guarantee the security of information processed online, we do have appropriate security measures in place to protect your personal information. For example, we store the personal information you provide on computer systems with limited access that are located in facilities to which access is limited.

12.4 To further protect your privacy and security, we reserve the right to take reasonable steps (such as requesting your password) to verify your identity before granting you profile access or making corrections.

12.5 Additionally, you should ensure your password is kept secret at all times. You will be responsible for maintaining the secrecy of your password and account information.

13. **UNSUBSCRIBING TO COMMUNICATIONS**

13.1 If the User does not want to receive any e-mails from us in the future, they are required to let us know by making a request for the same by sending an email to fitness.kheloindia@gmail.com. We will use our reasonable endeavours to remove the User's name from the related mailing list within 30 working days of his/her request. The User may also change his/her preferences at any time by revising his/her account profile by un-ticking the boxes for the previously opted communications.

13.2 The User may also click the "unsubscribe" link (if present) at the bottom of any emails he/she may receive from us and follow the necessary instructions provided.

14. **PRIVACY MEASURES FOR MINORS:**

14.1. Registration as a 'User' on the Khelo India platform is intended only for persons who are 18 years of age or above and Users below the age of 18 are strictly prohibited from accessing/using the platform. If the User is under 18 years of age, he/she shall not be permitted to use the platform.

14.2. Only the legal guardian/parent of the young athletes/children/wards and/or the School Principal/teacher of the School of the young athletes/children/wards shall be able to register Members on the Khelo India platform and enter their details and information. No other third parties shall be allowed to register Members on the Khelo India platform and enter their details and information. Members shall not be allowed to register and/or create an account and/or log in to the Khelo India platform.

14.3. If the User or the parent/guardian of the Members and/or the School Principal/Teacher and/or the young athletes i.e. Members, believe that we may have inadvertently collected personal information, they can notify us and make a request for modification/correction/deletion of the same immediately by sending an email to fitness.kheloindia@gmail.com.

15. CHANGES AND UPDATES TO INFORMATION:

15.1. This Privacy Policy may be revised from time to time and this will be reflected by the "Last update posted" date above. Please revisit this page to stay aware of any changes.

15.2. Contact Information: Please contact the platform with any questions or comments about this Privacy Policy by emailing us at fitness.kheloindia@gmail.com.

15.3. The User is responsible for keeping his/her information current. The User may update his/her information by contacting us at fitness.kheloindia@gmail.com and we will use reasonable efforts to process any change the User makes; provided, however, that requests to delete information are subject to our internal reporting, processing and retention policies and all applicable legal obligations.

16. LANGUAGE

16.1. All communications between the User and the platform shall be communicated in written form vide Electronic Mail (E-Mail) and in either English or Hindi language. Further, all communications between the User and the Customer Support shall also be conducted in either English or Hindi language.

17. FEEDBACK

17.1 Any comments or suggestions that you may have and which may contribute to improvement of the Khelo India platform will be appreciated. Please feel free to write to us at fitness.kheloindia@gmail.com in case you want to share your feedback with us. In case of any grievances, you may send your complaints for redressal to: fitness.kheloindia@gmail.com

This is the current Privacy Policy which should be read in conjunction with the Terms & Conditions. It replaces any other Privacy Policy for the Khelo India platform published on the Khelo India platform to date. SAI may at any time amend the Privacy Policy by publishing the amended Privacy Policy on the Khelo India platform without notice, unless there is a material change to the rights granted to users herein. If the terms of this Privacy Policy are not acceptable to you, please do not continue using the Khelo India platform provided through the same.