

PRIVACY POLICY

Objective and Scope

Radio City ("we", "us", "our", "Radio City") values the trust placed in us by data subject ("you", "your", "user", "subscriber") and therefore, we follow the highest standards of privacy guidelines to protect the information shared by you with us

This privacy policy describes the usage of information provided or collected by Music Broadcast Limited (Radio City) and/or its subsidiary (ies) and/or affiliate(s), which operates various websites/ Mobile applications & other services including but not limited to delivery of information and content via any mobile or internet connected device or otherwise (collectively the "Services"). We follow this privacy policy in accordance with applicable law in the places where we operate. In some cases, we may provide additional data privacy notices specific to certain services or regions. Those terms are to be read in combination with this policy.

Radio City is owned and operated by Music Broadcast Limited, an Indian Company registered under the Companies Act, 1956 having its corporate office at 5th Floor, RNA Corporate Park, Kalanagar, Bandra East, Mumbai - 400051. With a view to offer most enriching and holistic internet experience to its users Radio City offers a vast repository of services. You may read `About Us` to know more about Radio City.

This Privacy Policy should be read in conjunction and together with the Terms of Use applicable to the Radio City Service that you are using.

What does this privacy policy cover?

The objective of the privacy policy is to inform you regarding the processing of your personal information which is collected during your visit to our website / Mobile applications. This policy applies to current and former visitors of the website / Mobile applications, users who register on Radio City in connection with use of our services, or whose information Radio City otherwise receives in connection with its services.

I. Collection and Use of Personal Information

Personal information (PI) - means any information relating to an identified or identifiable living person ('data subject' here in referred as you/your'). In particular using a common identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person or any other piece of information as per applicable laws and regulations.

The Company respects the privacy of the users of the Services and is committed to reasonably protect it in all respects. The information about the user as collected by the Company is:

A. Information you provide to us

We may hold personal information about you including, but not limited to the following:

- Name
- Date of Birth
- City

- Contact Number
- Email ID

We collect this information directly from you when you respond to a survey, participate in a contest on the website / Mobile applications, or otherwise provide this information to us.

Information Collected when you use our Mobile Application

When you download our mobile application we collect the below information, but not limited-

- Username
- Email ID
- Mobile Number
- Device ID
- Device Type

Information you provide to us voluntarily

We may collect additional information at other times, when you provide feedback(s), modify your content or email preferences, respond to surveys, or communicate with us by posting a comment on our website / Mobile applications / social media or asking us a question through phone or e-mail. This information may include personal information such as, but not limited to, your name, e-mail id, mobile number, comment, location etc.

B. Information Automatically Collected/Tracked while Navigation

Cookies

To improve the responsiveness of the "Services" for our users, we may use "cookies", (a small text file that may be used, for example, to collect your information about Website / Mobile applications activity. Some cookies and other technologies may serve to recall Personal Information previously indicated by a Web user) or similar electronic tools to collect information to assign each visitor a unique, random number as a User Identification ("User ID") to understand the user's individual interests using the identified computer. Our advertisers may also assign their own cookies to your browser(s) (if you click on their ads), a process that we do not control. We receive and store certain types of information whenever you interact with us via website(s), Application(s) or Services through your computer/laptop/notebook/ mobile/tablet/pad/handheld device or any other electronic device capable of connecting to internet.

You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser, but please note that if you choose to erase or block your cookies, you will need to re-enter your original user ID and password to gain access to certain parts of the Web site and some sections/features of the site may not work. For more details you can refer to our Cookie Policy

Log File Information

We automatically collect limited information about your computer's connection to the Internet, mobile number, including, but not limited to, your IP address, browser software, operating system types; clickstream patterns; and dates and times that our site is accessed, whenever you visit(s) our website(s), application or services.

Clear GIFs

We may use "clear GIFs" (Web Beacons) to track the online usage patterns of our users in an anonymous manner, without personally identifying the user. We may also use clear GIFs in HTML-based emails sent to our users to track which emails are opened by them. We also collect information from you passively using Google Analytics and Google search console for collecting information about your usage of our website / Mobile applications.

C. Inferred Information through usage and log data

We may collect and track certain information about you based upon your behaviour on the Radio City Services We use this information for conducting internal research on our users' demographics, devices, interests, and behaviour to better understand, protect and serve our users.

We may also collect your Information to track user behaviour and preferences for internal analytics and research. We may also use your information:

- To evaluate your interest for various genres of content, services, offers;
- To perform analytics and conduct customer research, to determine your interest, for identifying content that generate sales and to analyse traffic patterns.

If you choose to post messages on social media accounts, message boards, chat rooms or other message areas or leave feedback, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Radio City Services, we may collect and store such information.

D. Information obtained from other Sources

We may receive information about you from other online sources. We may add it to our account information system and treat it in accordance with this policy. If you provide information to the platform provider or other partner to whom we provide services, your account information including, but not limited to, your name, email ID, may be passed on to us. We may obtain updated contact information(s) from third parties in order to correct our records and fulfil the Services or to communicate with you or share the information with any third party.

If you link or connect to Radio City Services with a third party service such as Google or Facebook, they may send us information such as your registered e-mail id and public profile information from the service as stated above.

In case you choose to decline to submit personal information on the Application/Websites, we may not be able to provide certain services on the Application/Websites to you. We will make reasonable efforts to notify you of the same at the time of opening your account. In any case, we will not be liable and or responsible for the denial of certain services to you for lack of you providing the necessary personal information.

II. Processing of personal information

We will only collect and process personal data about you where we have lawful basis. Lawful basis on which we would process our personal information includes obtaining explicit consent from you for processing your personal information or processing for "legitimate

interests" where processing is necessary by us to provide you with services (For e.g. processing your information by our group companies/affiliates).

- We use information collected from cookies and other technologies, like pixel tags, to improve your user experience and the overall quality of our services. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with sensitive categories, such as those based on race, religion, sexual orientation or health.
- Send alerts and newsletter(s) to you (Provided you subscribe to the same. To unsubscribe, please click on "unsubscribe" on the newsletter.
- Send notification(s) to you on your handheld devices (To turn off the notifications, please visit your account settings)
- Communicate with you concerning our service (for example by email, push notifications), so that we can send you news about Radio City, details about new features and content available on the Radio City Services, promotional announcements, marketing purposes and surveys, other services of Radio City affiliates and to assist you with operational requests such as password reset requests.
- Improve our website / Mobile applications and its content to provide better features and services
- Conducting market research and surveys with the aim of improving our products and services.
- Preventing, detecting, investigating and prosecuting crimes (including but not limited to fraud and other financial crimes) in any jurisdiction, identity verification, government sanctions screening and due diligence checks
- Establishing, exercising or defending legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings.
- Our automated systems analyse your content to provide you customised search results, recommendations and specific promotions and offers
- To help advertisers understand our audience and confirm the value of advertising on our websites or Applications, (however it is usually in the form of aggregated statistics on traffic to various pages within our site)
- Notify you about changes in terms of service or privacy policy
- Allow you to participate in interactive features offered through our Services
- Sharing with our customer support team to resolve your queries/concerns related to your rights or services provided to you.
- If you no longer wish to receive a specific newsletter, follow the "unsubscribe" instructions located near the bottom of each newsletter

III. Third party services

Third parties provide certain services available on Radio City on Music Broadcast Limited's behalf. Radio City may provide information, including Personal Information that 'Radio City

collects on the Web to third-party service providers to help us deliver programs, products, information, and services. Service providers are also an important means by which Music Broadcast Limited maintains its Web site and mailing lists. Radio City will take reasonable steps to ensure that these third-party service providers are obligated to protect Personal Information on Radio City behalf.

Radio City does not intend to transfer Personal Information without your consent to third parties who are not bound to act on Radio City behalf unless such transfer is required for legal purposes or for providing relevant services. Similarly, it is against 'Radio City's policy to sell Personal Information collected online without consent.

When you are in a relationship with Radio City, your personal information may be transferred to European Economic Area (EEA) or outside EEA, for the purposes mentioned in this policy or to their local service providers for support in the pursuance of such purposes. Transfers to EEA or outside EEA are covered by standard data protection laws.

We present information to our advertisers to help them understand our audience and confirm the value of advertising on our website / Mobile applications. It is usually in the form of aggregated statistics on traffic to various pages within our site. When you register with Radio City, we contact you from time to time about updation of your content to provide the users such features that we believe may benefit you.

We use third-party advertising companies to serve ads when you visit our Web site. These companies may use information (not including your name, address, email address or telephone number) about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you

- The Radio City app contains a software development kit ("SDK") from a third party, Vmax <http://www.vmaxindia.com/Privacy-Policy.php> & Google AdMob
- The SDK is integrated with this app for the purposes of profiling the device on media consumption and other device data and utilizing the same to target relevant content and ads to the device ("Services") pursuant to the terms and conditions of VMax Services. Further details can be obtained at <http://www.vmaxindia.com/Privacy-Policy.php>
- If you do not wish for VMax to identify media content viewing around your mobile device, please opt out of all VMax Services via the following link: care@vmax.com.
- VMax does not collect any personal information or audio/video/image/contact files from your mobile device. For any questions or clarifications please reach out to: care@vmax.com
- VMax also automatically receives and tracks certain data about your mobile device (such as your device-type, installed software and language preference) or desktop interface; and may create a unique device or user ID for you. In some cases, VMax can automatically detect or infer your location using GPS, your IP address, etc., but often your operating system will require you to grant VMax permission to access your GPS settings; please refer to your device's system settings regarding location services.

Please keep in mind that when you provide information to us on a third-party site or platform (for example, via our applications like social media login the information we collect is through those third-party sites linked with our applications is covered by this privacy policy, and the information the third-party site or platform collects is subject to the third-party site or

platform's privacy practices. Privacy choices you have made on the third-party site or platform will not apply to our use of the information we have collected directly through our applications. Please also keep in observance that our sites and applications may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites. We encourage you to read the priva

Radiocity does not provide any personal information to the advertiser when you interact with or view a targeted ad. However, by interacting with an ad you are consenting to the possibility that the advertiser will make the assumption that you meet the targeting criteria used to display the ad.

IV. Children

To use the Site you agree that you must be the minimum age (described in this paragraph below) or older. The minimum age for these purposes shall be 16, however if local laws require that you must be older in order for Radio City to lawfully provide the services in the Site to you then that older age shall apply as the applicable minimum age. In all jurisdictions outside the European Union, if you are under the age of 18 or the age of majority in your jurisdiction, you must use Radio City under the supervision of your parent, legal guardian or responsible adult.

V. Information Sharing

We restrict access to your Personal Information to employees who we believe reasonably need to know/or that information in order to fulfil their jobs to provide, operate, develop, or improve our products or services

Radio City does not rent, sell, or share personal information about you with other people or non-affiliated companies except to provide products or services you've requested, when we have your permission, or under the following circumstances:

- We provide the information to trusted partners who work on behalf of or with 'Music Broadcast Limited' under confidentiality agreements. These companies may use your personal information to help Radio City communicate with you about offers from Radio City and our marketing partners. However, these companies do not have any independent right to share this information
- We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- We believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of 'Radio City terms of use, or as otherwise required by law.
- We transfer information about you if 'Radio City is acquired by or merged with another company. In this event, 'Radio City will notify you before information about you is transferred and becomes subject to a different privacy policy.
- Radio City works with vendors, partners, advertisers, and other service providers in different industries and categories of business. For more information regarding providers of products or services, please refer the section Third party services.

VI. Retention of personal information

Your personal information processed by Radio City are kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal information are processed in line with legal, regulatory, contractual or statutory obligations as applicable.

At the expiry of such periods, your personal information will be deleted or archived to comply with legal/contractual retention obligations or in accordance with applicable statutory limitation periods.

VII. Monitoring

To the extent permitted by law, Radio City may record and monitor your communications with us to ensure compliance with our legal and regulatory obligations and our internal policies. This may include the recording of telephone conversations.

VIII. Your Controls and Choices (As applicable under GDPR)

A. Accessing and Rectifying your personal information

When you use the Services Website/application (or any of its sub sites), we make reasonable efforts to provide you, as and when requested by you, with access to your personal information and shall further ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible. We ask individual users to identify themselves and the information requested to be accessed or corrected before processing such requests. We may decline to process requests that are unreasonably repetitive or systematic, requiring disproportionate technical effort, jeopardizing the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. You can make such requests by sending us an e-mail

B. Right to Rectification

You have the right for inaccurate or incomplete data we hold to be updated. You shall have the right to obtain from Radio City without undue delay the rectification of inaccurate personal information concerning you.

C. Data Portability

You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and have the right to transmit to another controller, wherever feasible

D. Data Erasure

We retain your personal information as long as necessary for us to provide services to you or you ask us to not retain your data. If you no longer want us to use your information then you can request that we erase your personal information and close your Radio City Services account. Please note that if you request for the erasure of your personal information;

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend a Radio City Services account for fraud or safety reasons, we may retain certain information from that account to prevent that user from opening a new account in the future.

- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, we may keep some of your information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) may continue to be publicly visible on the Radio City Services, even after your account is cancelled. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers.
- Because of the way we maintain certain services, after you delete your information, residual copies may take a period of time before they are deleted from our active servers and may remain in our backup systems.

E. Withdrawing Consent and Restriction of Processing

For withdrawing your consent at any time during the tenure of your services with us, you may choose to do so by sending us an e-mail. We shall review your request and may ask you to verify your identity. Post verification we will withdraw the consent for which request was made by you and stop any further processing of your personal information

F. Right to Object to the Processing

Except in very specific cases where provided by law, you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. Such right can be exercised at any time where your personal data is processed for direct marketing purposes.

G. Right to object being subjected to a decision based solely on automated processing, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except in specific cases provided by law.

Radio City shall provide information on action taken on a request pertaining to the rights above 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. Radio City shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for delay.

H. Complaints

If you have any complaints regarding processing of your personal information you may contact our Privacy Officer at contact@radiocity.in. You have the right to complaint about the data processing activities carried out by Radio City before the competent data protection authorities.

To invoke your data subject rights, please email us at contact@radiocity.in

IX. Security and Compliance with Laws

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized

access to systems where we store personal data. All information gathered is securely stored within the Company controlled database. The database is stored on servers secured behind a firewall on the cloud; access to the servers is password-protected and is strictly limited. However, as effective as our security measures are, no security system is impenetrable. If you know or have reason to believe that your Radio City Services account credentials have been lost, stolen, altered, or otherwise compromised or in case of any actual or suspected unauthorized use of your account, please contact us by contacting our customer support team.

X. Social media

Radio City operates channels, pages and accounts on some social media sites to inform, assist and engage with you. Radio City monitors and records comments and posts made on these channels about Radio City in order to improve its products and services.

Please note that you must not communicate with Radio City through such social media sites the following information:

- Sensitive personal data including (i) special categories of personal data meaning any information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and (ii) other sensitive personal data such as criminal convictions and offences and national identification number ;
- Excessive, inappropriate, offensive or insulting information towards individuals.

Radio City is not responsible for any information posted on those sites other than the information posted by its employees on its behalf. Radio City is only responsible for its own use of the personal data received through such sites Radio City shall not be responsible for any information posted by a third party which may be its/his/her individual views commenting of any topic, information, statements etc.

XI. Changes in the Policy

Radio City reserves the right to update, alter, change or modify this policy at any time. The policy shall come to effect from the date of such update, alteration, change or modification.

Contact Information

Support

If you require any information or clarification regarding the use of your personal information or this privacy policy or grievances with respect to use of your personal information, please email us at contact@radiocity.in .

Postal address

5th Floor, RNA Corporate Park,
Off Western Express Highway, Kalanagar, Government Colony,
Bandra East, Mumbai, Maharashtra 400051

XII. Disclaimer

Radio City shall not be liable for any loss or damage sustained by reason of any disclosure (inadvertent or otherwise) of any information concerning the user's account and / or information relating to or regarding online transactions using credit cards / debit cards and / or their verification process and particulars nor for any error, omission or inaccuracy with respect to any information so disclosed and used whether or not in pursuance of a legal process or otherwise

Any other personal information shared by you which is not asked by Radio City during registration, either mandatorily or optionally; accounts to wilful and intentional furnishing; and Radio City will not be liable for breach of such information.

CONTACT INFORMATION

If site users have any questions or suggestions regarding our privacy policy, please contact us at:

E-mail:

support@rcswappr.com

Telephone:

+91 22 66969100

Postal address:

5 th Floor, RNA Corporate Park , Off Western Express Highway ,Kalanagar, Bandra (E) Mumbai.

WEBSITE ADMINISTRATION

Business name:

rcswappr.com

Postal address:

5 th Floor, RNA Corporate Park , Off Western Express Highway ,Kalanagar, Bandra (E),

City:

Mumbai

State:

Maharashtra

Pin Code:

400 051

Country:

India

Website URL:

<https://rcswappr.com>