

PRIVACY POLICY

This privacy policy ("**Privacy Policy**") explains how Neem Healthcare Solutions, Inc. ("**Company**", "**We**", "**Us**", or "**Our**") collects, uses, stores, and processes information provided by the users of the platform ("**User**", "**You**", or "**Your**") in relation with the User's access and usage of Our website, namely neemhealth.com and the services provided through the website (collectively referred to as the "**Platform**"), unless a separate privacy policy or statement is explicitly provided for such service(s).

The Company operates an IT-enabled platform, facilitating interaction between patients from India and US-licensed medical practitioners for medical opinions or case reviews through their Indian counterparts, i.e. Indian registered medical practitioners. The Company's role is strictly limited to being an intermediary connecting patients with US-licensed medical practitioners through their Indian counterparts, i.e. Indian registered medical practitioners and after contact with these intermediaries was established first. This Privacy Policy outlines how the Company safeguards the Users' data or information shared during the process.

This Privacy Policy is designed with the User in mind, and it is important that the User has a comprehensive understanding of Our personal information, collection and usage practices, as well as complete confidence that ultimately, the User has control of any personal information provided to Us. In this Privacy Policy, "**Personal Information**" or "**Personally Identifiable Information**" means information that can be used to directly or indirectly identify an individual, either from that information alone or from that information combined with other information We have access to about that individual.

YOUR CONSENT: Please take a moment to familiarize yourself with Our Privacy Policy, data collection and usage practices. If You do not agree with the following terms of this Privacy Policy, please do not register on or access the Platform beyond this Privacy Policy page after launching it on Your device for the first time. If You continue to use the Platform, We shall understand that You are aware of this Privacy Policy and its contents and have provided Your informed consent on such basis. Accordingly, You agree and consent to Us collecting, storing, processing, transferring, and sharing Your Personally Identifiable Information with the service providers or trusted third parties for the purposes set out in this Privacy Policy.

You acknowledge and agree that the Company may share Your Personal Information, without obtaining any prior consent from You, with any government authority or agency that is lawfully authorised to request such information for purposes including identity verification, prevention or investigation of offences (including cyber incidents), or for any other lawful purpose under applicable law.

OUR COMMITMENT: We are proud to inform You that We are committed to ensuring Your privacy and the integrity of the data, and We will process such data only in accordance with the terms of this Privacy Policy and applicable data protection laws.

WHAT INFORMATION DO WE COLLECT ABOUT YOU? We collect information for the lawful purpose of rendering Our services through Our Platform. Collection of such data and information is essential for rendering Our services to the User(s) of Our Platform.

We might ask for Your Personal Information to identify You, like name, phone number, address, email address, etc., at different screens on Our Platform.

We may collect information about Your device and technical information, including the hardware model, operating system and version, preferred language, unique device identifier, advertising identifier, serial number, device motion information and network information.

We may also collect or store Your sensitive personal data or financial information, such as password, bank account details, credit card or debit card or other payment instrument details, sexual orientation, medical and health records, etc. ("**Sensitive Data**").

WHO DO WE SHARE THIS INFORMATION WITH? We do not share any Personal Information with unrelated third parties and only the authorised employees of the Company along with the below mentioned parties have access to the Personal Information.

For the purpose of making available Our services through Our Platform and facilitating communication between User(s) on the Platform, We may share Your Personal Information with independent service providers (such as registered medical practitioners) involved in Your inquiries or transactions. We may also engage third-party service providers for various operational needs, such as technology development for providing support, maintenance and further development of the Platform, communication, analytics, marketing assistance, and customer service. These third-party service providers might have the access to Personal Information needed to perform their functions, but may not use it for other purposes. Further, they must process the Personal Information in accordance with the applicable law. As mentioned above, We might also share Your Personal Information with the relevant Government/ Regulatory authorities, if instructed by them or as required under the applicable laws or to protect Our legal interests.

LOCATION DATA: We may require access to Your location data (both GPS and network based) to deliver Our services effectively. If You grant location permissions, We may collect Your approximate as well as precise location information at periodic intervals and share this data with the parties identified in the preceding paragraph.

CHILDREN'S DATA: We do not permit children i.e. persons below the age of 18 years to use Our Platform without their parent or guardian's consent or supervision.

NOTICE OF DATA COLLECTION: Where We collect Personal Information and Sensitive Data directly from You, We will explain the purposes for which We collect and use such information, the third parties to which We disclose that information, and the choices and means, if any, We offer to You for limiting the use and disclosure of such information. Notice will be provided in clear and conspicuous language. This explanation will be provided as soon as practicable and, in any event, before We disclose or use such information for a purpose materially different from that for which it was originally collected or processed.

WHY IS YOUR INFORMATION BEING COLLECTED? We need Your information to identify You uniquely, personalise Your experience, and provide You with customer support whenever required. We collect this information to improve the services offered through Our Platform, such as enabling communication between Users and medical practitioners, managing service-related inquiries and enhancing the overall User experience.

We may collect limited financial details required to complete transactions, which are processed through secure third-party payment gateways in compliance with applicable financial regulations.

Your data is also processed to ensure compliance and security, including meeting legal obligations under Indian and US laws, detecting and preventing fraudulent activities, and maintaining the integrity and security of Our systems and services.

We use anonymised or aggregated information for service improvement, allowing Us to analyse usage trends, enhance platform functionality, and improve overall user experience without compromising individual privacy.

Your information may also be processed for grievance handling, enabling Us to address complaints, resolve disputes, and fulfil any data subject rights request which You may raise in accordance with applicable laws.

Your information allows Us to improve Our Platform and provide You with a better user experience.

CHILDREN: We do not use the application to knowingly solicit data from or market to children. If a parent or guardian becomes aware that their child has provided Us with information without their consent, they should contact Us at grievances@neemhealth.com. We delete such information from Our files within a reasonable period of time.

HOW LONG DO WE STORE YOUR INFORMATION? We store Your information with Us and remove it when We receive a request from You to actively forget, delete or erase Your information or until such time that the purpose for which the data was collected is no longer relevant or till such time as required to comply with Our legal obligations.

In a certain situation, if We suspect You of committing fraud or violating Our terms, then We may be required by law to retain certain information about You, to the extent permitted by law.

DATA PROTECTION: We undertake reasonable security practices and procedures to protect Your Personal Information from unauthorised access, damage, use, modification, disclosure or impairment.

All data stored in Your device and transmitted to Our Platform is encrypted with access restricted for the usage stated in this Privacy Policy.

RIGHTS OF USER: As per the applicable data protection laws and as supplemented by Our internal practices, Your principal rights as a User are:

- the right to access;
- the right to know;
- the right to rectification;
- the right to erasure;
- the right to be forgotten/opt-out;
- the right to restrict or object to processing; and
- the right to limit the use of Sensitive Data.

You have the right to exercise any of the above rights by contacting Our Grievance Officer at grievances@neemhealth.com. Once We receive Your request and verify the same satisfactorily, We shall

proceed with assisting You on Your request. If You believe that the information We have about You is incorrect, You can contact Us to have the information updated and keep Your data accurate.

RIGHT TO BE FORGOTTEN: If at any point You wish to have Your information with Us deleted or removed from Our database, You can contact Us for the same at grievances@neemhealth.com.

The Grievance Officer is identified in terms of applicable laws in India including the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, framed thereunder and the Consumer Protection Act, 2019, and the Rules enacted under these laws.

WHAT HAPPENS WHEN WE MAKE CHANGES TO THIS POLICY? We keep Our Privacy Policy under regular review and may update the same to reflect changes to Our information related practices. Such changes to Our Privacy Policy shall apply from the effective date as set out on the Platform. We encourage You to periodically review this page for the latest information on Our privacy practices. Your continued use of the Platform will be taken as acceptance of the updated Privacy Policy.

YOUR DATA IS IMPORTANT TO US: We understand how important Your data is for You. We respect Your privacy and are concerned with protecting Your data and privacy and take all requisite and reasonable steps for such protection. That said, We cannot warrant the security of any information that You share with Us or guarantee that Your information with Us may not be accessed, disclosed, altered, copied or destroyed by breach of any of Our industrial standard physical, technical or managerial safeguards.

We have attempted to answer all Your questions. However, if You have questions or concerns regarding Our Privacy Policy or practices, please contact our Grievance Officer at grievances@neemhealth.com.

This Privacy Policy was last revised on August 14, 2025.

COMPLIANCE UNDER THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023: We are committed to protecting Your Personal Information and Sensitive Data in compliance with applicable data protection laws. This Privacy Policy has been prepared keeping in view the provisions of the Digital Personal Data Protection Act, 2023, which is expected to come into force shortly. The detailed rules under the Act are yet to be notified. Once they are released and the Act becomes operational, this Privacy Policy will be updated to incorporate the prescribed requirements by the Act and ensure full compliance under the Act. Until then, We continue to adhere to the existing data protection framework in India.

CONTENT OWNERSHIP: This Privacy Policy and the information contained herein is the sole and exclusive property of the Company and shall not be copied, reproduced or quoted anywhere, whether verbally or in writing, without the prior written consent of the Company.

This Privacy Policy is published pursuant to, and in compliance with the Information Technology Act, 2000, and the rules thereunder, more specifically the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and, where applicable, foreign laws such as the California Consumer Privacy Act, 2018, and the California Privacy Rights Act, 2020.

This document is created by Corrida Legal, and any questions with respect to the interpretation (meaning) of the abovementioned clauses can be sought directly from the firm.