

# **Privacy Notice**

Narayana Health Insurance Ltd. ("NHIL") is committed to respecting the privacy of every person who shares information with NHIL. Your privacy is important to us and we strive to take reasonable care and protection of the information we receive from you, the User. In this regard, we adhere to the applicable governing laws in India. NHIL collects information in accordance with the applicable laws and is committed to take all reasonable precautions to preserve the integrity and prevent any corruption or loss, damage or destruction of the data and information. This Privacy policy provides information on how we collect, use, disclose your Personal information. It also provides information on your rights.

# **Information Collected**

You are required to provide certain information to use the Service of NHIL. You may provide information during the following circumstances:

1. By filling in Proposal forms for availing our services which includes information such as ABHA ID name, date of birth, Gender, address, Email id, pan card number, Aadhaar Number, CKYC number, family income, occupation, proof of address (either of electricity Bill, telephone Bill, Aadhaar, Passport, Ration Card, Bank Account Statement), Assignee / Nominee name, date of birth and relationship with the assignee/nominee along with their ABHA ID or while completing the Know-Your-Customer ("KYC") for customer onboarding or during the claims / payout process. This may include contact information such as name, email address, mailing address, phone number, KYC documents like Identity proof such as (Aadhaar ID, Passport No., Voter ID, PAN, Driving License, NREGA Job Card), address proof (such as electricity, telephone and gas bill, bank statement,) Policy Details, details of hospitalization and treatment undertaken, etc.

For the purpose of availing the services of the Insurance you also need to provide details of your nominee/dependant such as their name, age, gender, date of birth and relationship with you and Identity Proof.

- 2. Voluntarily, when you call or write directly to us for any service-related queries or issues.
- 3. Additional information may be required for the purposes of issuance of policies and processing of your refunds, claims, payouts, etc. This might comprise of your information such as health information, lifestyle related data and bank account details (for claims payout).
- 4. You also consent to the use, disclosure and sharing of the personal information about you or with respect to other members covered under the policy, beneficiary / nominee (whether collected by Us or received from third-party insurance agencies or provided by you), including but not limited to information about you / co-applicants health, physical attributes, medical history, and lifestyle, etc. by Us. This will help you avoid repeat queries/tests, and help you avail the additional products, services or other new offerings as per the terms of this Privacy Policy.
- 5. In the event of any changes to any personal information or KYC documents or health / lifestyle information in the KYC or other documents (as the case may be), you are required to inform the same to us by contacting us at grievance@narayanahealth.insurance

All information, documents, undertakings and data provided by you should be true, current and correct.

## Consent

You acknowledge that You have provided Your Personal Information out of your free will and after understanding how it will be used. You also consent that the collection, storage, processing, disclosure and transfer of any Personal Information shall not cause any wrongful loss to You, if it is done in accordance with the provisions of

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this Privacy Policy. However, we shall not be liable for any loss that may happen to you owing to the provision of wrongful Personal Information provided by You.

You have the right to withdraw Your consent at any point, provided such withdrawal of the consent is intimated to us in writing through an email at <u>support@narayanahealth.insurance</u> requesting the same. You may note that the consent withdrawal process will be done within a reasonable time, not exceeding **45** days from the data of Your request. If You wish to rectify the Personal Information that we may have collected to offer You personalized services and offers, you may write to the Grievance Officer (whose contact details are available in the subsequent sections), citing the reason for such rectification of Personal Information.

Once You withdraw Your Consent to share the Personal Information collected by Us, we shall have the option not to fulfil the purposes for which the said Personal Information was sought and We may restrict you from using our Services or the Website.

# How do we use your Personal Information

- 1. provide the services offered by us including but not limited to personalizing user experience and sending you information about your insurance policy, your premium due dates, claims settlement details, etc.
- 2. undertake KYC checks and verification including to establish and verify your identity.
- 3. undertake the on-boarding process or creation of your account.
- 4. conduct research and analysis to develop new products / services, improve our services / Platform, or to detect, prevent, mitigate, and investigate fraudulent or illegal activities.
- 5. send You and/or your contacts (as permitted by you) notifications.
- 6. to enable us to comply with any legal and regulatory obligations or requisition requests by any authority under the applicable laws including to enable Us to proactively communicate with IRDAI, or law enforcement agencies or any other government or judicial body in connection with any suspicious, illegal, fraudulent, or unlawful activities.
- 7. to enforce our legal rights against you.
- 8. for enabling customer support to you including to help us to respond to your pre-sale and post-sale requests and support needs, including any claims and/or payout requests, efficiently and without delay.
- 9. for enabling communication with you including for enabling marketing and outreach activities including promotion of new products, services, and/or platforms offered on or through the Platform.
- 10. to help avoid repeat tests or checks or questions to and by You, and to allow You / Your co-applicants to avail the additional products, services, or other new offerings.
- 11. to contact You / other members covered under the policy / Nominee / Dependant or otherwise communicate with You / the Nominee/Dependant to offer new products, services, facilities, features and/or discounts, as appropriate.
- 12. assess serviceability of services or features offered.
- 13. to assist you with exercising Data Principal Rights Requests
- 14. perform internal operations necessary to provide our Services or the Platform, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends.
- 15. To contact you for refund or cancellation or confirmation of a purchase or failed transaction or the claims or payout process with respect to the Services, products and/or policies availed by you or wherein you have expressed interest or intent of purchase.
- 16. We use information to send you transactional communication. We might send you emails or SMS/es or messages through other technology enabled messaging apps about your account, or use of the Services or the Platform or a policy purchase.

# Sharing and Transfer of your Personal Information

1. Once you have freely consented to share your Personal Information with us, You authorize us to exchange, transfer, share, part with all or any of Your Personal Information, across borders and from Your country to any other countries across the world with the Cloud Service Provider and Our affiliates / agents / third party

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administrators / service providers / partners or any other persons, for the Purposes specified under this Policy or as may be required by applicable law.

2. You acknowledge that some countries where we may transfer Your Personal Information may not have data protection laws that are as stringent as the applicable local laws. You acknowledge that it is adequate that when NHIL transfers Your Personal Information to any other entity within or outside the country, NHIL will place contractual obligations on the transferee which will oblige the transferee to adhere to the provisions of this Privacy Policy.

# **Data Principal Rights**

You have certain data principal rights with respect to personal data belonging to you collected by NHIL for the purposes mentioned in this Privacy Notice. The rights are available to you as per the Digital Personal Data Protection Act, 2023 and/or other applicable laws:

#### 1. Right to Access Information

You have the right to request for:

- a) a summary of personal data that is being processed and the processing activities undertaken with respect to such personal data
- b) the identities of all other Data Fiduciaries and Data Processors with whom the personal data has been shared by NHIL, along with a description of the personal data so shared
- c) any other information related to the personal data and its processing, as may be prescribed

#### 2. Right to Correction and Erasure

You have the right to request for :

- a) Correct the inaccurate or misleading personal data
- b) Complete the incomplete personal data
- c) Update personal data
- d) Erasure of personal data

#### 3. Right to Nominate

You have the right to nominate a representative in your place to in case of incapacity, death, etc.

#### 4. Right to Grievance Redressal

You have the right to have readily available means of grievance redressal provided by a Data Fiduciary or Consent Manager in relation to any act or omission.

## Security

We may collect and store your personal data in electronic and/or physical form, depending on the requirement. Information may be stored at our and third-party premises within IT Systems (e.g., external cloud storage, internal or third-party management systems, e-mails, databases, hard drives), document warehouses, etc.

We endeavor, where practicable, to process your personal data in a safe environment by preventing any unauthorized or unlawful processing of personal data or accidental loss or destruction of, or damage to, such information. We train our employees about the importance of maintaining the privacy and security of your Personal Data. We have implemented various physical, technical, and administrative security measures to protect your personal data and our network from unauthorized access. Some of these measures include:

- a) encryption
- b) strict adherence to privacy and security practices
- c) periodic security assessments and reviews to upgrade our practices
- d) restriction of access to personnel who have a need to know such data

## How Do We Ensure Children's Privacy?

Some of our services and processes require collection of Children's Personal Data. For such purposes we use appropriate lawful bases for the processing based on verifiable consent from the parent/legal guardian of the child. The information in the relevant parts of this notice applies to children as well as adults.

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# How Do We Use Cookies and other Tracking Mechanisms?

We use cookies and other tracking mechanisms on our website to collect data about you. We use the data collected from cookies and trackers to analyse trends and statistics. This will help us optimize and customize your website experience and to provide better website functionalities. We collect Personal Data about you via our Mobile App using permissions such as camera, storage, location, etc. Your iOS and Android devices will notify you of the permissions that our App seeks and will provide you an option to consent to or refuse the permission. We use the data obtained through permissions to enhance the functionality of the App and to analyse it to serve you better.

## **Data Retention**

We collect, share and retain your personal information only for the purpose specified above, including ensuring compliance with applicable laws. Subject to IRDAI and other relevant regulatory or law enforcement requirements or other obligations under applicable laws which may prescribe longer periods, we will retain your personal information in identifiable form until you withdraw your consent.

## **Grievance Officer**

We have appointed a Grievance Officer to address any concerns or grievances that you may have regarding the processing of your Personal Information. If you have any such grievances, please write to our Grievance Officer at grievance@narayanahealth.insurance and Our officer will attempt to resolve Your issues in a timely manner.

# **Notification of Changes**

We reserve the right to amend, modify, vary, or update this Privacy Notice, at our sole discretion from time to time, as and when the need arises. The most recently published Privacy Notice shall prevail over any of its previous versions. You are encouraged to check this Privacy Notice from time to time to stay informed of any changes.

### Disclaimer

By submitting personal data to us, you acknowledge that:

You have read and understood this Privacy Notice and agree and consent to the use, processing and transfer of personal data as set out herein; and

All information and representation provided are true and correct to the best of your knowledge, and you have not knowingly omitted any relevant information which may have an adverse effect.

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