

## **PRIVACY POLICY**

This Privacy Policy explains how we at Bajaj Finserv Health Limited (collectively, “BFHL”, “Company”, “we,” “us,” or “our”) having its registered office at Bajaj Auto Limited Complex, Mumbai Pune Road, Akurdi, Pune – 411035, Maharashtra and corporate office at 4th floor, Phoenix Fountainhead, Nagar Road, Clover Park, Viman Nagar, Pune 411014, Maharashtra collect, use, share and process your information, that you provide to us through your use of the app [*Bajaj Finserv Health Doctor*] (“App”) and website [[www.doctors.bajajfinservhealth.in](http://www.doctors.bajajfinservhealth.in)] (“Website”) in the course of providing services (“Services”) as defined in the [Terms and Conditions](#), to you.

This Privacy Policy is published in accordance with the provisions of Rule 3 (1) of the Information Technology (Intermediaries Guidelines and Digital Media Ethics Code) Rules, 2021 that require publishing the rules and regulations, privacy policy and terms of use for access or usage of Services.

If you require any clarification or information regarding this Privacy Policy or the use of your Personal Information or any general inquiry/clarification or inquiry regarding the App/ Website or if you have any grievances regarding the Services, Terms of Use and Privacy Policy, or any other grievance pertaining to your use of the BFHL Platforms, you may contact-

**Grievance Officer:** Mr. Satish Shetty

**Address:** 4th floor, Phoenix Fountainhead, Nagar Road, Clover Park, Viman Nagar, Pune 411014, Maharashtra

**Email address:** [doctorsupport@bajajfinservhealth.in](mailto:doctorsupport@bajajfinservhealth.in)

**Contact Number:** 020-66849111

### **1.1. What is Personal Information?**

Personal information is that information which can be used to directly or indirectly to identify you. It includes de-identified data that, when linked to other information available to us, would enable us to identify you. Personal data does not include data that has been irreversibly anonymized or aggregated so that we cannot identify you through it, even in conjunction with other information.

By proceeding to downloading of the App or proceeding to the Website, and/or using our services you represent that you voluntarily provide us with personal information including medical and financial information and consent to their collection, use and disclosure in accordance with this Privacy Policy.

You also represent that you are duly authorised by any third party (including your patient) whose information you share with us. We shall act as per your representation of authority and shall not make any independent enquiries to ascertain the veracity of your authorisation. In the event you do not have sufficient authorisation or consent from your patients to share any information, you shall be solely responsible for your acts and omissions including sharing of information with us by you and the consequential processing and actions taken by us in accordance with this Privacy Policy.

### **1.2. Types of Personal Information We Collect**

When you sign up or register on our App or Website to use our Services, and during the course of actual usage of our Services, the types of information that will be collected by us includes:

- a. Contact information: Name, Address, Contact details, Email ID, Phone Number;
- b. Demographic information: Gender, Age, Date of Birth;

- c. Your location details (basis the permission received from you) to be used for sharing on other BFHL platforms;
- d. Data regarding your educational qualifications and professional credentials, practice area, specialisations, and professional memberships, if any;
- e. Details regarding your clinic (name, logo, location, consultation fee and other relevant information);
- f. Any certifications or distinctions that you have received;
- g. Any information we may collect in order to assess your credentials;
- h. Details regarding your usage of the Services, such as: history of the appointments made through the use of Services, patient history, case note, records input by you;
- i. Financial information such as bank account or credit card or debit card or other payment instrument details, billing information;
- j. De-identified information regarding your patients by assigning a unique ID to such patients, enabling *inter alia* the tracing of repeat appointments, only to the extent permitted by applicable and / or patient consent, as relevant;
- k. Your call recordings with the patients made through BFHL Platform/free call back option or others for internal audit and quality monitoring purpose;
- l. Any other detail relating to the above as voluntarily provided to BFHL by you, for providing value added service;
- m. Any information relating to patients that you share with adequate authorisation and consent in line with the Terms of Use; and
- n. Any additional information that you voluntarily choose to provide to BFHL through any mode of communication or during any interaction or while using the BFHL Platform.

### **1.3. Source of Data Collection**

Your Personal Information may be collected from following sources:

- a. Before onboarding you, we may request information regarding your qualifications, experience, public profile, and representations made;
- b. During your usage of the App / Website, we may collect information based on your use of the Services;
- c. We may collect other information that you voluntarily choose to provide to us through app, website, email, during interaction with us on call or chat and other modes of communication;
- d. We may collect information from any group company, affiliates, associates, subsidiary, holding company of BFHL, associates and subsidiaries of holding company of BFHL to whom you have given consent for sharing of information for availing value added service;
- e. We may collect any information from a third party (including but not limited to business partners of BFHL) to whom you have consented to disclose your information to their partners/affiliates/service providers/users.

### **1.4. How We Use Your Personal Information**

We use your Personal Information for purposes, which include the following:

- a. Your registration for the purpose of receiving our Services, identification, communication, notification and for fulfilment of the Terms of Use;
- b. Offering you personalized Services;
- c. Creation and maintenance of health records in electronic form;
- d. Improvement of our products and services;
- e. Research and analysis, including for the development of commercial solutions;

- f. Addressing your requests, queries and complaints, in any, pertaining to our Services; other customer care related activities;
- g. Investigating, enforcing, and resolving disputes;
- h. For the purpose of contacting you to provide you with information on new Services and offers, taking feedback;
- i. To send notices, communications, alerts, new offers relevant to use of the Services offered by BFHL on Website/App;
- j. Carrying out our obligations in relation to any agreement with our business partners or contractors;
- k. Technical administration and customization of Website/App, and other general administrative and business purposes;
- l. To send you information about special promotions or offers (either offered by BFHL, its affiliates or by its business partners), new features or products of the BFHL (including its affiliates) as well as third-party offers or products with whom BFHL has a tie-up;
- m. For communicating with your patients to the extent you and the patient in question have authorised us to make communication;

### 1.5. Disclosure and Transfer of Personal Data

We may disclose and, in some cases, transfer your personal information to such entities as required to provide Services to you and to provide value added services or other third party products and services, to the extent permitted by applicable law. These entities may be located outside India, which you hereby consent to. We require such entities to protect your information through equivalent security measures as what we would adopt. An indicative list of entities we may disclose or transfer information to, are provided below:

- a. **Service Providers:** We share personal data with companies that provide Services on our behalf, such as website hosting, data storage, software services, email services, marketing, fulfilling customer orders, providing payment services, data analytics, data mining, providing customer services, and conducting surveys. These companies may be located within or outside India, but in any case are obligated to protect your data.

We may also share information with employees, data processors, consultants, business partners and technology partners on a need to know basis. Such entities would be contractually obligated to maintain confidentiality in relation to your data.

- b. **Business Affiliates:** We may disclose or transfer some of your information to group companies, affiliates, associates, subsidiary, holding company of BFHL, associates and subsidiary of holding company of BFHL including foreign entities, business partners of BFHL, and in particular group companies and affiliates who are involved in the provision of products and services, to the extent permitted by applicable law.

In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, asset sale, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal data to the relevant third party with the same rights of access and use.

- c. **Customers on other BFHL Platforms:** We may share information such as your name, contact details, practice area, and qualifications, with your patients, including prospective patients, who search for doctors on other BFHL platforms, where you have consented to being listed on such platforms. Any response which you might give on any query posted by any customer on any other

BFHL platform, will be visible to all the users along with your name, specialization, profile link and other details. Your name and specialisation along with other details might be published along with any blog post/video clip obtaining your explicit consent for such publication.

- d. **Law Enforcement Agencies:** We may share information with law enforcement agencies pursuant to lawful requests for information, and otherwise as required under any law applicable at the given time, both in India and outside India.
  
- e. **Other Third Parties:**
  - (i) We may also disclose personal data if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.
  - (ii) Anonymised, aggregated data that cannot re-identify you, may be shared with advertisers, research firms and other partners.
  - (iii) In case of any contests or surveys conducted by BFHL in which you participate, your information may be disclosed to third parties, to the extent necessary and other aspects of such contest/survey or similar offering.

## 1.6. Your Rights

We take reasonable steps to ensure that your personal information is accurate, complete, and up to date. However, you have the sole responsibility of ensuring that you review the accuracy of information provided by you and contact us in case of discrepancies, or in case you wish to discontinue the use of our services. You have the following rights with regard to your personal information:

- a. You have the right to access your personal information, and request correction and deletion. If your personal information changes, you may correct, delete inaccuracies, or amend information by making the change on our member information page or by contacting us through [doctorsupport@bajajfinservhealth.in](mailto:doctorsupport@bajajfinservhealth.in) or on 020-66849111. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or subsequently becomes untrue, inaccurate, out of date or incomplete), or we have reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, we may, at our sole discretion, discontinue the provision of the Services to you. There may be circumstances where Company will not correct, delete or update your personal information, including (a) where the personal information is opinion data that is kept solely for evaluative purpose; and (b) the personal information is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.
- b. You are free not to share any medical or other information that you consider confidential and withdraw consent for us to use data that you have already provided. In the event that you refuse to share any information, or withdraw consent to process information that you have previously given to us, we reserve the right to restrict or deny the provision of our services for which we consider such information to be necessary.
- c. You may contact us for any questions/grievances or for exercise of these rights.

Address:  
Bajaj Finserv Health Limited  
Pheonix Fountainhead,

4<sup>th</sup> Floor, Nagar Rd, Clover Park,  
Viman Nagar,  
Pune, Maharashtra 411014  
Email: [doctorsupport@bajajfinservhealth.in](mailto:doctorsupport@bajajfinservhealth.in)  
We will respond to your request within a reasonable time.

### **1.7. Data Retention Policy**

We store personal information provided by you in accordance with applicable laws, which means we keep data you provide for as long as necessary to provide services or as may be required under any law.

We shall store such personal information for lawful purposes only. We keep de-identified data for research and statistical purposes for a longer period.

If you close your account, we have no obligation to retain the data you provide, and we may delete any or all of such data without liability. However, we may retain data provided by you if we believe it may be necessary to prevent fraud or future abuse, or if required by law, or for other legitimate purposes. We may continue to store the data provided by you in anonymised form for analytical and research purposes.

### **1.8. Information Security Policy**

We use reasonable technical, administrative, and physical security measures for the purpose of safeguarding all data you share with us. We also have comprehensive internal policies in place to prevent unauthorized access to your data. We take adequate steps to ensure that third parties we share data with also adopt reasonable level of security practices and procedures to ensure the privacy and security of your information.

Please note that while information you input into our systems are reasonably secure as per the standards mentioned above, any information including patient information is subject to reasonable risks. We are not responsible for any loss, unauthorised access, safety issue or any harm caused to you by any misuse of your personal information, unless it is a direct and foreseeable consequence of negligence and non-compliance on our part only. You hereby acknowledge that we are not responsible, in particular, for any third party action or action on your part leading to loss, damage or harm to you or any other person.

For any data loss or theft due to unauthorized access to your electronic devices through which you avail our Services, Company shall not be held liable for any loss whatsoever incurred by you. Further, you are liable to indemnify the company as per the Terms of Use

### **1.9. Third Party Websites and Services**

Our Website and App may contain links to third party services, and give you the ability to access such third-party websites, products, and services. Please note that you may proceed to the use of such third party website or service at your own risk and BFHL will not be held liable for any outcome or harm arising as a result of your use of such third party websites or services. Please read the privacy policies of any third party before proceeding to use their websites, products, or services.

### **1.10. Changes to this Privacy Policy**

We may periodically revise or update this Privacy Policy. Your continued use of our products and services after the effective date of the Privacy Policy means that you accept the revised Privacy Policy. If you do not agree with any such revised terms, please refrain from using our Services and contact us to close any

account you may have created. In a few cases, we may provide additional data privacy notice specific to certain services. Such privacy notices are to be read in conjunction with this Privacy Policy.

In the event there are significant changes in the way BFHL treats your personally identifiable information, the revised Privacy Policy will be displayed on the Website and we may inform you of the same over email. If you object or disagree with any of the changes or you no longer wish to use the Services, you may contact [doctorsupport@bajajfinservhealth.in](mailto:doctorsupport@bajajfinservhealth.in) to deactivate your account.

To see the prior version of the Privacy Policy, please [click here](#).

**Last Updated:**

8 March 2022