

# PRIVACY POLICY WINNGOO D REMIND PLATFORM

**Effective Date:** [Insert Date]

This Privacy Policy describes how **Winngoo D Remind** (“Company”, “we”, “us”, or “our”) collects, processes, stores, and protects information when individuals access or use the Winngoo D Remind reminder platform, including its website, mobile applications, and associated digital services (collectively referred to as the “Platform” or “Service”). The purpose of this Privacy Policy is to ensure transparency regarding our data practices and to inform users of their rights and responsibilities regarding personal information shared with the Platform.

By accessing or using the Platform, registering an account, submitting personal information, or interacting with reminder services, users acknowledge that they have read, understood, and agreed to the data collection and processing practices described in this Privacy Policy.

## INTRODUCTION AND POLICY SCOPE

### 1. Purpose of this Privacy Policy

The primary purpose of this Privacy Policy is to clearly explain how personal data and other information are collected, used, disclosed, stored, and protected when users interact with the Platform. As the Platform operates as a digital reminder and organisational tool that allows users to store time-sensitive information and receive automated alerts, it necessarily processes certain types of personal data to deliver these services effectively.

This Privacy Policy is intended to provide users with detailed information about the categories of personal data that may be collected, the purposes for which such information is used, and the measures implemented to ensure appropriate data protection and security.

In addition, this policy outlines the rights available to users in relation to their personal data, including rights of access, correction, deletion, and restriction of processing where applicable under relevant data protection laws.

### 2. Scope of Application

This Privacy Policy applies to all information collected through the Platform, including data provided directly by users as well as data collected automatically through the operation of the Service. The policy covers information obtained through the website interface, mobile applications, notification systems, customer support communications, and other digital interaction channels provided by the Company.

The policy applies to all users who access the Platform, regardless of whether they are registered account holders or casual visitors. Certain features of the Platform may require users to create accounts and submit personal information in order to utilise reminder functionalities.

Where third-party services are integrated with the Platform, additional privacy practices may apply depending on the service provider involved.

### **3. Acceptance of Privacy Practices**

By registering for an account, creating reminders, submitting personal data, or otherwise interacting with the Platform, users acknowledge that they have reviewed this Privacy Policy and agree to the collection, use, and processing of their information as described herein.

Users who do not agree with the provisions of this Privacy Policy should refrain from using the Platform and should discontinue any active use of the Service. Continued use of the Platform following updates to this Privacy Policy constitutes acceptance of those changes.

The Company encourages users to review this policy periodically to remain informed about how their personal data is handled.

### **4. Relationship with Terms and Conditions**

This Privacy Policy operates in conjunction with the Platform's **Terms and Conditions**, which govern the overall use of the Service and establish the legal framework under which users interact with the Platform.

Where relevant, provisions contained within the Terms and Conditions may complement or clarify certain aspects of this Privacy Policy, particularly in areas relating to user responsibilities, acceptable use of the Service, and limitations of liability.

In the event of any conflict between the Privacy Policy and the Terms and Conditions regarding privacy matters, the provisions of this Privacy Policy shall prevail to the extent permitted by applicable law.

### **5. Updates to this Privacy Policy**

The Company reserves the right to modify, update, or revise this Privacy Policy at any time to reflect changes in operational practices, technological developments, regulatory requirements, or legal obligations.

When updates are made, the revised version of the Privacy Policy will be published on the Platform along with the updated effective date. Where material changes occur, the Company may notify users through email communications, in-app notifications, or other reasonable means.

Users are encouraged to review the Privacy Policy periodically to remain informed about the Company's data handling practices.

### **6. Legal Compliance and Applicable Privacy Laws**

The Company is committed to processing personal data in accordance with applicable privacy, cybersecurity, and data protection laws, including the Digital Personal Data Protection Act, 2023 ("DPDP Act"), the Information Technology Act, 2000 and applicable rules thereunder

(India), the UK General Data Protection Regulation (“UK GDPR”), the European Union General Data Protection Regulation (“EU GDPR”), and other applicable privacy and data protection laws in jurisdictions where the Platform operates or provides services.

The Company implements reasonable administrative, technical, organisational, and security measures designed to ensure lawful, fair, transparent, and secure processing of personal information.

Where required under applicable law, the Company may obtain user consent before processing personal data, sending communications, enabling cookies, or using analytics technologies.

Users located in different jurisdictions may have additional rights or protections under local privacy laws applicable within their country or region.

## **INFORMATION WE COLLECT**

### **7. Personal Identification Information**

The Platform may collect personal identification information when users register an account or interact with certain features of the Service. This information may include details such as the user’s name, email address, phone number, login credentials, and other identifying information necessary for account management.

Such information is used to establish user accounts, authenticate users during login, facilitate communication regarding reminder notifications, and maintain secure access to the Platform. The information provided during registration must be accurate and complete to ensure proper operation of the reminder service.

Users are responsible for keeping their account information updated and notifying the Company if any personal details change.

### **8. Reminder Data and User Content**

A core function of the Platform involves allowing users to create reminders and store related information such as event names, descriptions, due dates, and notification preferences. This data may include personal notes or information relating to subscriptions, appointments, financial obligations, or important life events.

The Platform stores this reminder data to generate notifications according to the schedule defined by the user. Reminder information is processed automatically by the system to ensure the timely delivery of alerts.

The Company does not review or monitor reminder content except where necessary for technical support, system maintenance, or compliance with legal obligations.

### **9. Device and Technical Information**

When users access the Platform, certain technical data may be automatically collected to ensure proper functioning of the Service. This information may include device identifiers, operating system details, browser type, IP address, language preferences, and time zone settings.

Technical information is collected to improve system compatibility, troubleshoot technical issues, enhance platform security, and optimise performance across various devices and operating environments.

This information may also assist the Company in detecting unauthorised access attempts or unusual activity that may indicate potential security threats.

## **10. Usage and Interaction Data**

The Platform may collect information about how users interact with various features of the Service. This may include data relating to user navigation patterns, login frequency, reminder creation activity, and engagement with notifications.

Usage data helps the Company analyse trends, identify frequently used features, and determine how the Platform can be improved to better serve users. Such information is typically aggregated and analysed for service optimisation purposes.

The Company may also use usage data to diagnose technical problems and improve system stability.

## **11. Communication Data**

Users who contact the Company through support channels, email communications, or feedback forms may provide additional personal information during those interactions. The Company may retain records of such communications to respond effectively to inquiries and provide assistance where necessary.

Communication records may also be used to improve customer service quality, address recurring issues, and maintain a record of service-related communications for operational and legal purposes.

## **HOW WE USE INFORMATION**

### **12. Providing Reminder Services**

Personal information collected through the Platform is primarily used to provide reminder services and related functionalities. This includes storing reminder details, processing notification schedules, and delivering alerts through the communication channels selected by users.

Without such information, the Platform would not be able to generate or deliver reminders effectively.

### **13. Account Management**

User information is used to create and maintain user accounts, authenticate login credentials, and ensure secure access to the Platform. Account management processes also involve verifying user identity, where necessary, and maintaining system integrity.

### **14. Communication with Users**

The Company may use contact information such as email addresses or phone numbers to send important service communications. These communications may include system notifications, reminder confirmations, updates to policies, security alerts, or administrative messages.

The Company does not send unsolicited marketing communications unless users have provided consent where required by law.

### **15. Platform Improvement and Development**

Data collected through the Platform may be analysed to understand user behaviour and identify areas for improvement. Insights obtained from such analysis may help the Company enhance user experience, introduce new features, and optimise system performance.

### **16. Security Monitoring and Fraud Prevention**

Information collected from users may be used to monitor platform activity and detect suspicious behaviour that may indicate fraud, unauthorised access, or misuse of the Platform.

Security monitoring processes help protect both the Platform and its users from potential cyber threats.

## **DATA SHARING AND DISCLOSURE**

### **17. No Sale of Personal Data**

The Company does not sell, rent, or trade personal information collected from users to third parties for advertising or marketing purposes. Protecting user privacy is a fundamental principle guiding the Company's data handling practices.

### **18. Service Providers and Infrastructure Partners**

The Company may engage trusted third-party service providers to support the operation of the Platform. These providers may include cloud hosting companies, messaging services, analytics providers, and technical support partners.

Such providers are permitted to access personal data only to the extent necessary to perform services on behalf of the Company and are required to maintain strict confidentiality obligations.

## **19. Legal and Regulatory Compliance**

The Company may disclose personal information where required by law or where necessary to comply with legal processes such as court orders, subpoenas, or governmental requests.

## **20. Protection of Rights and Safety**

Disclosure of information may also occur where necessary to protect the rights, safety, or property of the Company, its users, or the public.

## **21. Business Transfers**

If the Company undergoes a merger, acquisition, restructuring, or sale of assets, personal data held by the Platform may be transferred as part of that transaction.

## **DATA STORAGE, RETENTION AND SECURITY**

### **22. Data Storage Infrastructure**

The Company stores user information on secure servers maintained either directly by the Company or through trusted third-party cloud infrastructure providers. These systems are designed to provide reliable storage and processing of reminder data, account information, and operational records necessary for the functioning of the Platform.

Data storage systems may be located in multiple geographic regions depending on operational requirements and the infrastructure providers used by the Company. The Company takes reasonable steps to ensure that such providers maintain appropriate security standards consistent with industry best practices.

All stored data is handled in accordance with applicable data protection laws and internal security procedures designed to protect user information from unauthorised access or misuse.

### **23. Security Measures and Safeguards**

The Company implements a combination of administrative, technical, and physical safeguards to protect personal information against unauthorised access, alteration, disclosure, or destruction. These measures are designed to maintain the confidentiality, integrity, and availability of user data processed through the Platform.

Security safeguards may include secure server environments, encryption protocols, access restrictions, network monitoring tools, and internal data protection policies. Only authorised personnel with legitimate operational responsibilities may access sensitive data.

While the Company continuously evaluates and improves its security practices, users should understand that no digital platform can guarantee absolute security against all potential threats.

## **24. Encryption and Access Controls**

Where appropriate, the Company may utilise encryption technologies to protect sensitive data during transmission and storage. Encryption methods help ensure that personal information cannot be easily accessed or intercepted by unauthorised parties.

Access to user information within the Company's internal systems is restricted to personnel who require such access for operational or technical purposes. These individuals are subject to confidentiality obligations and internal policies governing responsible data handling.

System access controls, authentication procedures, and monitoring systems are regularly reviewed to maintain secure data management practices.

## **25. Data Retention Periods**

The Company retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including the provision of reminder services, maintenance of user accounts, and compliance with legal obligations.

Retention periods may vary depending on the nature of the data and the operational requirements of the Platform. For example, reminder data may be stored for the duration of an active account, while certain technical logs or transaction records may be retained for security, auditing, or regulatory purposes.

When data is no longer required for these purposes, the Company will take reasonable steps to securely delete, anonymise, or otherwise dispose of the information.

## **26. Data Deletion and Account Closure**

Users who wish to delete their personal data may request account closure through the Platform's account settings or by contacting the Company's support team. Upon account closure, the Company will initiate procedures to remove personal data associated with the user account.

Certain information may be retained for a limited period following account deletion where required to comply with legal obligations, resolve disputes, enforce agreements, or maintain system security.

The Company may also retain anonymised or aggregated data that does not identify individual users for statistical or operational purposes.

## **USER RIGHTS AND DATA CONTROL**

### **27. Right to Access Personal Data**

Users have the right to request access to personal information stored by the Platform. Upon receiving a valid request, the Company may provide users with information regarding the

categories of data collected, the purposes for which the data is used, and the sources from which the information was obtained.

Access requests may be subject to identity verification procedures to ensure that information is disclosed only to the appropriate individual.

The Company will respond to access requests within a reasonable timeframe in accordance with applicable data protection laws.

## **28. Right to Correct or Update Information**

Users have the right to request correction of inaccurate, incomplete, or outdated personal information maintained by the Platform. In many cases, users may update their information directly through their account settings.

Where corrections cannot be made through the user interface, users may contact the Company's support team to request updates. Maintaining accurate information helps ensure that reminder notifications and platform communications are delivered properly.

## **29. Right to Request Data Deletion**

Users may request deletion of personal information associated with their account where such deletion is permitted under applicable law. Upon receiving a valid deletion request, the Company will evaluate whether the requested data can be removed without violating legal obligations or legitimate operational requirements.

If deletion is approved, the Company will take reasonable steps to permanently remove the relevant data from active systems within a reasonable timeframe.

## **30. Withdrawal of Consent**

Where the processing of personal data is based on user consent, users have the right to withdraw such consent at any time. Withdrawal of consent may affect the availability of certain platform features that rely on the processing of personal data.

For example, disabling notifications or withdrawing consent for reminder processing may prevent the Platform from delivering certain alerts or services.

## **31. Data Portability**

Where technically feasible and required by applicable law, users may request a copy of their personal data in a structured and commonly used electronic format. Data portability enables users to transfer their information to other services if they choose to do so.

The Company will take reasonable steps to fulfil such requests while maintaining appropriate security measures to prevent unauthorised disclosure.

## **COOKIES AND TRACKING TECHNOLOGIES**

### **32. Use of Cookies and Similar Technologies**

The Platform may use cookies, mobile SDKs, device identifiers, pixels, local storage technologies, and similar tracking mechanisms to improve user experience, facilitate secure operation of the Service, remember user preferences, and analyse platform usage.

Cookies are small text files or similar technologies stored on a user's device that enable the Platform to recognise returning users, maintain secure sessions, and provide enhanced functionality.

These technologies may support features such as authentication, language preferences, notification settings, performance monitoring, and personalised interface functionality.

### **33. Types of Cookies and Technologies Used**

The Platform may use different categories of cookies and tracking technologies, including:

- essential cookies required for core platform functionality and security;
- performance and analytics cookies used to evaluate system performance and improve user experience;
- functionality cookies used to remember user preferences and settings;
- device identifiers and mobile analytics technologies used within mobile applications to improve stability and performance.

Essential cookies and similar technologies may remain active where necessary for the operation and security of the Platform.

### **34. Consent and Cookie Preferences**

Where required by applicable law, the Platform may request user consent before placing or activating non-essential cookies, analytics technologies, or similar tracking mechanisms.

Users may manage, restrict, disable, or delete cookies through browser settings, mobile device permissions, or available cookie preference tools provided by the Platform.

Disabling certain cookies or tracking technologies may affect the availability, functionality, or performance of certain Platform features.

### **35. Analytics and Third-Party Technologies**

The Company may use third-party analytics and performance monitoring providers to evaluate how users interact with the Platform and to improve system stability, functionality, and user experience.

Such technologies may collect technical and usage-related information, including device type, operating system details, session activity, interaction patterns, crash reports, and general usage statistics.

Analytics information is typically processed in aggregated, anonymised, or pseudonymised form where reasonably practicable.

Further information regarding cookies and tracking technologies may be provided through separate cookie notices, consent banners, or supplemental privacy disclosures where required by applicable law.

## **CHILDREN'S PRIVACY**

### **36. Age Restrictions**

The Platform is intended for use by individuals who are at least eighteen (18) years of age or who have reached the legal age of majority in their jurisdiction. The Company does not knowingly collect personal information from children under this age threshold.

If the Company becomes aware that personal data belonging to a minor has been collected without appropriate authorisation, reasonable steps will be taken to remove such information from the Platform.

### **37. Parental Requests for Data Removal**

Parents or legal guardians who believe that a child has submitted personal information through the Platform may contact the Company to request removal of the relevant data. The Company will investigate such requests promptly and take appropriate action where necessary.

## **INTERNATIONAL DATA TRANSFERS**

### **38. Cross-Border Data Processing**

Depending on the infrastructure used to operate the Platform, personal data may be processed or stored in countries outside the user's home jurisdiction. These international data transfers may occur when cloud infrastructure providers or service partners operate servers in different regions.

The Company takes reasonable measures to ensure that such transfers are conducted in accordance with applicable legal standards.

### **39. Safeguards for International Transfers**

Where data is transferred across international borders, the Company may rely on contractual safeguards, industry-standard security practices, or other legally recognised mechanisms to ensure adequate protection of personal information.

These safeguards are intended to maintain a consistent level of privacy protection regardless of where the data is processed.

## **POLICY ADMINISTRATION**

### **40. Privacy Policy Updates**

The Company may update this Privacy Policy periodically to reflect changes in legal requirements, technological advancements, or operational practices. Updated versions of the policy will be posted on the Platform.

### **41. Notification of Policy Changes**

Where significant changes to the Privacy Policy occur, the Company may notify users through email communications, in-app notifications, or other reasonable methods to ensure users are aware of the updated practices.

### **42. User Responsibility to Review Policy**

Users are encouraged to review this Privacy Policy periodically to remain informed about how their information is handled. Continued use of the Platform after updates have been published constitutes acceptance of the revised policy.

### **43. Third-Party Websites**

The Platform may contain links to external websites operated by third parties. This Privacy Policy does not apply to such external websites, and users are encouraged to review the privacy policies of those services before providing personal information.

### **44. Compliance with Applicable Laws**

The Company aims to comply with applicable data protection laws and regulatory requirements relevant to the jurisdictions in which the Platform operates. Compliance efforts may involve implementing internal policies, conducting security assessments, and cooperating with regulatory authorities where required.

### **45. Security Incident Response**

In the event of a data security incident that affects personal information, the Company will take reasonable steps to investigate the matter, mitigate potential harm, and comply with applicable legal notification requirements.

#### **46. Data Protection Responsibility**

The Company maintains internal procedures and responsibilities relating to data protection and privacy compliance. Personnel handling personal data are expected to follow strict confidentiality and data protection standards.

#### **47. Recordkeeping and Compliance**

The Company may maintain internal records relating to data processing activities, security measures, and compliance procedures to demonstrate adherence to privacy obligations and regulatory requirements.

#### **48. Privacy Complaints**

Users who have concerns regarding the handling of their personal data may contact the Company through the designated support channels. The Company will make reasonable efforts to investigate and address privacy concerns in a timely manner.

#### **49. Regulatory Cooperation**

Where required by law, the Company may cooperate with data protection authorities or regulatory bodies responsible for overseeing privacy and data protection compliance.

#### **50. Policy Integration**

This Privacy Policy forms part of the overall legal framework governing the Platform and should be read together with the Platform's Terms and Conditions and any other applicable policies.

#### **51. Contact Information**

Users who have questions, requests, or concerns regarding this Privacy Policy or the handling of personal information may contact the Company through the official contact channels provided on the Platform.

The Company will make reasonable efforts to respond to privacy-related inquiries and requests within an appropriate timeframe.

- CONTACT NO:
- EMAIL: