

PRIVACY POLICY

1. Introduction

Welcome to **Raffle Tech** (hereinafter “RaffleTech”), operated by Raffletech LLC having place of business at Dubai United Arab Emirates (hereinafter referred to as “**Company**”, “**Us**”, “**We**”, or “**Our**”). The Company provides a variety of services which include but are not limited to Digital raffle Solutions (hereinafter referred to as “**Service**”).

This Privacy Policy (hereinafter the “**Policy**”) governs your visit to RaffleTech and explains how we collect, safeguard and disclose your data we obtain from you in connection with our Service. This Policy describes the treatment of information provided or collected by the Company for various purposes. This Policy applies only to information submitted and collected directly by Company when providing Our Services. We use your data to provide and improve our Service. By using or browsing the Service, you agree to the collection and use of information in accordance with this policy.

By using and accessing RaffleTech and the Services provided by the Company, you agree to be bound by the terms of this Policy. It is your duty to read and review the terms of this Policy before you access our Services. Your continued use of the Services, will be constituted as your acceptance of these provisions of this Policy. If you don't agree with any of the clauses of this Policy, we recommend you not use RaffleTech for any purpose.

ALL HEADING USED HEREIN ARE ONLY FOR THE PURPOSE OF ARRANGING THE VARIOUS PROVISIONS OF THE AGREEMENT IN ANY MANNER. NEITHER THE USER NOR THE CREATERS OF THIS PRIVACY POLICY MAY USE THE HEADING TO INTERPRET THE PROVISIONS CONTAINED WITHIN IT IN ANY MANNER.

2. Definitions

- a. “**Personal Data**” or “**Personal Information**” or “**Information**” shall mean and refer to any personally identifiable information that We may collect from You and can be used to identify, locate, or contact you. Such information includes but not limited to, your name, email address, postal address, and phone numbers.
- b. “**Usage Data**” means the data collected automatically that is either generated by You using the Service or from the Service infrastructure.

- c. **“Cookies”** means a small bit of record-keeping information that sites often store on a user’s computer or mobile device.
- d. **“Data Processors” or “Service Providers”** means any natural or legal person who processes the data on behalf of the Company. We may use the services of various Service Providers in order to process your data more effectively.
- e. **“User” “You” or “Your”** shall mean any individual/entities/corporates using our Service. The User corresponds to You, who is the subject of such Personal Data.

3. How we collect the Information

We are committed to respecting Your online privacy and We further recognize Your need for appropriate protection and management of any Personal Information You share with Us. We may collect the following information:

- a. Information You Provide to Us: There are portions of RaffleTech where we may need to collect Personal Information from You for a specific purpose. For instance, at the time of signing up and registration , we collect your Personal Information including name, company name, email address, phone/mobile number, postal address and other business information which may also include business statutory details and tax registration numbers. Further, when You decide to Contact us using the portal provided or through email or through any other way, we may collect and store such information provided by You.
- b. Information that is automatically collected: In general, You can access the RaffleTech without telling us whom You are or revealing any information about Yourself. We may use automated means to collect various types of Information about You or Your device used to access the RaffleTech Such automated collection of information may include, without limitation, network or IP address, type of operating system you are using, mobile network, device identifiers, device settings, browser settings, the type of handheld or mobile device used to view the Website, location information, and the content and advertisements You have accessed, seen, forwarded and/or clicked on. Please refer to Cookie section of this Policy, for more information about how the foregoing Information may be collected and used.

We do not automatically capture any specific personal information from you, (like name, phone number or e-mail address), that allows us to identify you individually. If the RaffleTech requests you to provide Personal Information, You will be informed for the particular purposes for which the information is gathered and adequate security measures will be taken to protect Your Personal Information.

The Company will not use your financial information for any purpose other than to complete a transaction with you. To the extent possible, we provide you the option of not divulging any specific information that you wish for us not to collect, store or use. You may also choose not to use a particular service or feature, and opt out of any non-essential communications

c. Location Data

We may use and store information about your location if you give us permission to do so. We use this data to provide you with features of our Service, and to further improve and customize our Service. If you wish to not share your location with us, you can disable the location setting on your device when you use our Service at any time

4. How We use and disclose the Information

- a.** We will not use Your data in a manner materially different from that stated in this Policy without notifying you.
- b.** The Company uses the collected data for various purposes including but not limited to:
 - i. to provide and maintain our Service;
 - ii. to notify you about changes to our Service;
 - iii. to allow you to participate in interactive features of our Service when you choose to do so;
 - iv. to provide customer support;
 - v. to gather analysis or valuable information so that we can improve our Service;
 - vi. to monitor the usage of our Service;
 - vii. to detect, prevent and address technical issues;
 - viii. to fulfil any other purpose for which you provide it;
 - ix. to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
 - x. to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;
 - xi. to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
 - xii. in any other way we may describe when you provide the information;

- xiii. for any other purpose with your consent or in accordance with applicable law.
- c. The Company collects this information in a transparent way and only with the full knowledge of Parties. Once this information is available to us, the following rules apply:
 - i. The data collected will be, collected, stored, processed and secured in accordance with applicable laws, rules, regulations and other policies; kept accurate and up-to-date; collected fairly and for lawful purposes; processed by the company within its legal and moral boundaries; and, protected against any unauthorized or illegal access by internal or external parties using every reasonable effort.
 - ii. The data collected will not be, communicated informally; sold, rented, leased or traded; stored for more than a specified amount of time; transferred to organizations, states or countries that do not have adequate data protection policies; and, distributed to any party other than the ones agreed upon by the User (exempting legitimate requests from law enforcement authorities).
 - iii. We may disclose your personal information to third parties in accordance with this Policy under certain circumstances. This includes but is not limited to sharing personal information to:
 - I. Our employees;
 - II. our third-party service providers;
 - III. our marketing providers;
 - IV. our legal advisors; and
 - V. applicable government agencies.
- d. In certain exceptional circumstances, we may be required to disclose your personal information in response to lawful requests by public authorities, under applicable law, including to meet national security and law enforcement requirements. We may disclose your personal information in response to summons, court orders, or other legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary to do so, in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.

5. Retention of Information

- a. We will retain your Personal Data only for as long as is necessary for the purposes set out in this Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations in accordance with applicable law.
- b. We may disclose your personal information in response to summons or subpoenas, court orders, or other legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary to do so, 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 our Services, or as otherwise required by law.
- c. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a short period, except when this data is used to strengthen the security or to improve the functionality of our Service, or in the event we are legally obligated to retain this data for longer time periods.

6. Third Party Websites

- a. RaffleTech contains links to various third party and other sites having their own terms and conditions and privacy Policy. We may use remarketing services to advertise on third-party websites to you after you visited our Service.
- b. You are cautioned to read the terms and conditions of such third party websites and/or privacy policies before using such websites. You acknowledge that we have no control over such third party's site and We shall not be responsible or liable to claim arising out of such third party site, in relation to any content, products or services made available on such a website.
- c. You are requested to visit Privacy Policy of such websites before submitting any information.

7. Cookies

- a. We use cookies and similar tracking technologies to track the activity when using our Service.
- b. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from our website and stored on your device. Other tracking technologies are also used including but not limited to beacons, tags and scripts to collect and track information in order to improve and analyse the Service we provide you.
- c. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to access or use some portions of our Service.
- d. Examples of Cookies we use:

- A. Session Cookies: We use Session Cookies to operate our Service.
- B. Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
- C. Security Cookies: We use Security Cookies for security purposes.
- D. Advertising Cookies: Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

8. Transfer of Data

- a. Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.
- b. If you are located outside India and choose to provide information to us, please note that we transfer the data, including Personal Data, to India and process it there.
- c. Your consent to this Policy followed by your submission of such information represents your consent to transfer such information. The Company will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

9. Correcting, Updating and Removing Your Information

- a. If you wish to correct, update, or delete inaccuracies in personal information stored or processed by Us or access such information, you can email a request regarding the same.
- b. To make a request to have personal information maintained by us accessed or updated please email raffle@raffle-Tech.com Requests to access, change, or remove your information will be handled within thirty (30) days.
- c. We will retain personal information that we store and process for as long as needed to provide the Services to You. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- d. If You have provided us with information in connection with your use of our Services, we will update or delete this information upon your request, provided that, notwithstanding such request, this information may be retained for as long as you maintain Your use of our Services, or as needed to provide you with our Services, comply with our legal obligations, resolve disputes and enforce our agreements.

10. Security of Data

- a. Your privacy is very important to Company and we are committed to protecting your personal information from unauthorized access, use or disclosure. We protect the data collected from you through both online and offline mode. We, in order to ensure security and confidentiality of your personal information have proportionate and appropriate physical, electronic and managerial security measures and practices in place. We protect your information from unauthorized access, alteration, disclosure, loss, misuse or destruction.
- b. The security of your data is important to us but remember that no method of transmission over the internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.
- c. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received.
- d. Further, you shall be responsible for providing accurate contact information to Company at all times. You shall indemnify and hold the Company harmless against any and all claims made in relation to inaccurate or wrong information provided by you to the Company.

11. Data Processors/Service Providers

- a. We may employ third-party companies and individuals to facilitate our Service and provide Service on our behalf, perform Service-related services or assist us in analysing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and such Parties are bound by obligations of confidentiality and are obligated not to disclose or use it for any other purpose.
- b. Analytics: We may use third-party Service Providers to monitor and analyse Your use of our Service.
- c. CI/CD tools: We may use third-party Service Providers to automate the development process of our Service.

12. Children's Privacy

Our Services are not intended for use by minors under the age of 18 ("Child" or "Children"). We do not knowingly collect Personal Data from Children under 18. If you become aware that a Child has provided us with Personal Data, please contact us at raffle@raffle-Tech.com. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove such information from our Servers.

13. Your Rights

Unless subject to an exemption, you have the following rights with respect to your personal data:

- a. The right to request a copy of your personal data which we hold about you.
- b. The right to request for any correction to any personal data if it is found to be inaccurate or out of date.
- c. The right to withdraw Your consent to the processing at any time.
- d. The right to object to the processing of personal information.
- e. The right to obtain information as to whether personal data are transferred to a third country or to an international organization.

14. Indemnification

You agree to indemnify and hold harmless Raffle Tech, its affiliates, partners, officers, directors, employees, and agents from any and all claims, liabilities, damages, losses, costs, and expenses (including legal fees) arising out of or in connection with any breach of this Privacy Policy or any unauthorized use, disclosure, or access to personal data collected and processed by Us. You agree to defend, indemnify, and hold the Company harmless from and against any claims, actions, or demands, including without limitation reasonable legal and accounting fees, arising or resulting from your use of the Services/ RaffleTech or the personal data collected and processed therein or your breach of this Privacy Policy.

15. Changes to this Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Policy on this page. We will let you know via email and/or a prominent notice on our Service, thirty (30) days prior to the change becoming effective. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page. It is your duty to read and review the terms of this Policy from time to time before you access our Services.

16. Jurisdiction

If you choose to access the RaffleTech, your visit and any dispute over privacy is subject to this Policy and the terms of use. In addition to the foregoing, this Policy and any disputes arising under this Policy shall be governed by the laws of UAE

17. Dispute Resolution

Any controversy or claim or dispute or difference arising out of or relating to this Policy of any provisions hereof or any breach or alleged breach hereof, shall be referred to, and finally settled in accordance with the provisions of the Arbitration and Conciliation Act, 1996 by a sole arbitrator, to be jointly appointed by both the Parties, in case the parties fail to resolve such disputes amicably. The place of arbitration shall be UAE and the arbitration shall be conducted in English.

18. Contact Us

If you have any questions about this Privacy Policy, please contact us by sending an email to raffle@raffle-Tech.com