

WELLVICA SENSITIVE INFORMATION PROTECTION POLICY

Overview

WELLVICA Private Limited (hereinafter referred to as “WELLVICA” or the “Company”) is committed to protecting the confidentiality, integrity, and security of personal and sensitive information provided by its customers, employees, Franchisees, Wellmarts, Wellness Point Holders, C&F Partners, Direct Sellers, and WELLVICA Associates.

WELLVICA recognizes the importance of safeguarding personal information and takes all reasonable measures to protect the privacy and interests of individuals whose information is collected, processed, stored, or transmitted through its business operations.

Scope

This Policy governs the collection, processing, storage, transfer, disclosure, and protection of Sensitive Personal Data or Information (SPDI) by WELLVICA and applies to all concerned persons who provide such information to the Company.

Objective

The primary objective of this Policy is to:

- Protect personal and sensitive personal information.
 - Ensure confidentiality and privacy of information.
 - Prevent unauthorized access, disclosure, misuse, or loss of data.
 - Comply with applicable laws and regulations relating to data protection and information security.
 - Promote transparency in the handling of personal information.
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Applicable Laws

This Policy shall be governed by:

- Information Technology Act, 2000
- Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011

- Consumer Protection Act, 2019
 - Consumer Protection (Direct Selling) Rules, 2021
 - Consumer Protection (E-Commerce) Rules, 2020
 - Any other applicable laws and regulations in force in India
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Definitions

Company

“Company” means WELLVICA Private Limited.

Concerned Person

“Concerned Person” includes:

- Customers
- WELLVICA Associates
- Employees
- Super Wellmarts
- Wellmarts
- Master Wellmarts
- Franchisees
- Wellness Point Holders
- C&F Partners
- Any individual whose personal information is collected by WELLVICA

Personal Information

“Personal Information” means any information relating to a natural person which, either directly or indirectly, in combination with other information available with WELLVICA, is capable of identifying such person.

Data

“Data” means a representation of information, facts, concepts, instructions, or knowledge processed or intended to be processed in a computer system or network.

Information

“Information” includes data, messages, text, images, audio, video, software, databases, codes, and computer-generated records.

Password

“Password” means a secret code, passphrase, encryption key, or security credential used to access information or systems.

Cyber Incident

“Cyber Incident” means any real or suspected event that compromises confidentiality, integrity, or availability of information systems or data.

Sensitive Personal Data or Information (SPDI)

Sensitive Personal Data or Information includes:

1. Passwords
 2. Financial Information, including:
 - Bank Account Details
 - Credit Card Information
 - Debit Card Information
 - Payment Instrument Details
 3. Physical, Physiological, or Mental Health Information
 4. Medical Records and Medical History
 5. Sexual Orientation Information
 6. Information relating to the above categories provided for service delivery
 7. Any information received, processed, or stored under lawful contractual arrangements
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Need for Information

As a general practice, WELLVICA does not require Sensitive Personal Data or Information except where necessary for:

- Order processing
- Commission payments
- KYC verification
- Regulatory compliance
- Customer support
- Product-related services
- Health-related consultations or wellness programs

All information shall be collected in compliance with applicable laws and only for legitimate business purposes.

Collection of Information

1. Consent-Based Collection

- WELLVICA shall collect Sensitive Personal Data only with the consent of the concerned person.
- Consent may be obtained through:
 - Written Authorization
 - Email Confirmation
 - Mobile OTP Verification
 - Electronic Consent Mechanisms

2. Collection for Lawful Purpose

Sensitive Personal Data shall only be collected when:

- Required for lawful business activities;
- Necessary for providing services;
- Required under applicable laws or regulations.

3. Knowledge of Collection

At the time of collection, WELLVICA shall take reasonable steps to ensure that the concerned person is aware of:

- The fact that information is being collected;
 - The purpose of collection;
 - The intended recipients of information;
 - The identity and contact details of the entity collecting and retaining the information.
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Retention of Information

WELLVICA shall retain personal information only for as long as necessary:

- To fulfill the purpose for which it was collected;
- To comply with legal and regulatory obligations;
- To resolve disputes and enforce contractual obligations.

Information shall not be retained longer than required under applicable law.

Use of Information

Personal and Sensitive Personal Information shall be used solely for the purposes for which it was collected.

WELLVICA shall not be responsible for verifying the authenticity of information provided by any individual.

Withdrawal of Consent

The provider of information shall have the right to:

- Refuse to provide sensitive information;
- Withdraw previously granted consent at any time.

Conditions:

- Withdrawal requests must be submitted in writing.

- Withdrawal of consent may affect WELLVICA's ability to provide certain products, services, benefits, or business opportunities.
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Grievance Redressal

WELLVICA shall address any discrepancy or grievance regarding personal information.

A designated Grievance Officer shall be appointed to:

- Receive complaints;
 - Investigate concerns;
 - Resolve grievances within 30 days from the date of receipt.
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Disclosure of Information

Disclosure to Third Parties

WELLVICA may disclose personal information:

With Consent

Information may be shared with third parties only after obtaining prior consent from the concerned person.

Without Consent

Information may be disclosed without prior consent when required by:

- Government Authorities
- Law Enforcement Agencies
- Courts or Judicial Authorities
- Regulatory Authorities

for purposes including:

- Identity Verification
- Investigation of Offences
- Prevention of Fraud
- Cyber Incident Investigation

- Compliance with Applicable Laws

Protection Against Publication

WELLVICA shall not publicly disclose or publish Sensitive Personal Data or Information.

Third parties receiving such information must maintain confidentiality and shall not further disclose it without authorization.

Parties with Whom Information May Be Shared

Personal Information may be shared with:

- Group Companies
- Service Providers
- Subcontractors
- WELLVICA Associates
- Payment Processors
- Logistics Partners
- Auditors
- Regulators
- Government Authorities
- Courts and Tribunals
- Any person authorized by the concerned individual

Such disclosures shall be limited to lawful and necessary purposes only.

Transfer of Information

WELLVICA may transfer Sensitive Personal Data to another entity where:

- The receiving party maintains the same level of data protection;
- The transfer is necessary for the performance of a lawful contract;
- The concerned person has provided consent for such transfer.

Information Security & Reasonable Security Practices

WELLVICA implements appropriate administrative, technical, and physical safeguards to protect personal information.

The Company follows internationally recognized information security standards and reasonable security practices, including compliance with:

IS/ISO/IEC 27001 – Information Security Management Systems (ISMS)

Security measures include:

- Access Controls
- Password Protection
- Data Encryption
- Network Security Controls
- Secure Storage Systems
- Cyber Security Monitoring
- Employee Awareness Programs

Notification of Changes

WELLVICA reserves the right to modify, update, or amend this Policy at any time.

Any changes shall become effective upon publication on the official website. Users are encouraged to periodically review this Policy to stay informed about updates.

Contact Us

For any questions, concerns, or support regarding this Policy, please contact:

Email: support@wellvica.com

WELLVICA PRIVATE LIMITED

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