



Sim Star Asia Limited - Privacy Policy

1. Introduction

The website <https://www.simstar.co>, the *Android/Playstore* mobile application titled **SimStar** and the *IOS/App Store* mobile application titled **SimStar** (collectively referred to as “Platforms”), **WhatsApp Support/Chatbot** named **SimStar Support** are operated by us, Sim Star Asia Limited, having our address at 18th Floor, The Cameron, 33 Cameron Street, TST, Kowloon, Hong Kong, China (“Us / We / Our” – as the context so requires”). This Privacy Policy (“Policy”) governs the collection, storage and usage of Your data, i.e., the and data (including sensitive personal information and data – hereinafter “Data”) of the visitors (“You”) who access and / or create an account on and / or transact on the Platforms. Your continued use of Platforms shall entail and signify your unconditional acceptance of this Policy.

2. Collection of the Data

We collect Your Data when You register an account with us and only that Data is collected which is required to verify Your account, to provide You with the services You require and to create the best browsing experience for You.

When You register to create an account with us, we shall require the following Data from You:

- Your full name, including First and last name
- Your contact details including Your email id and Your mobile number
- The Username and password for the account created by You
- Your Company's name and address, including the city, state, country, zip code of office
- Details of two referrals including their full name, company name, and their contact details such as phone number.
- Your identity proof including Your photograph
- Your Business' identity proof

The Platforms may contain links from third parties to other platforms or gateways or websites that are not under our control, such as payment gateways or social networking sites. We explicitly do not guarantee the accuracy, integrity, or quality of the site and / or Data, or any other content available on such third-party platforms. Any and all Data provided by You to such third-parties shall be governed in accordance with the policies and terms of such third-parties – thus, we would recommend that you review the policies of such third parties prior to providing any data.

3. Storage of the Data

The Platforms shall be hosted on third-party servers who are compliant with the relevant data protection laws and regulations. As We have taken all reasonable measures and steps to safeguard Your Data, You hereby specifically agree and confirm that You understand that We shall never be liable for any data theft or breach of security at the third party data centers / servers.

We shall retain Your Data for as long as it is required to provide You with the services you have requested, and thereafter for legal and service purposes, as mandated by the law in force and rest assured, We shall never transfer or utilize Your Data in any manner whatsoever without Your express consent.

4. Usage of the Data

We use the Data provided by You for the following:

- To verify the client details prior to activating the accounts
- To respond to the contact form filled up by You
- To receive and manage orders, memo requests, hold requests from clients
- To receive and manage product inquiries and general inquiries from Visitors
- To receive and manage appointments requests from potential clients
- To send newsletters
- To send important updates / communications to, such as important updates regarding the Platforms, any revisions / amendments / modifications to our Terms and / or the Policy.
- To send service announcements,
- To contact You regarding Your customer service requests, if any.
- To process any grievance that You may have in relation to the Policy or the Platforms.
- To enforce our payment terms and other policies of the Platforms, if so required.
- To comply with all legal requirements and disclosures provided under the laws for the time being in force.

“By providing your phone number, you consent to receive transactional and promotional communication from”

Sim Gems via WhatsApp

We may, in future, utilize the Data to analyze visitor preferences and behaviors on the Platform, this would be done by analyzing the compiled data on an aggregated basis. Such compiled and aggregated data would only reflect broad trends and it would not be used to identify You personally. Such compiled Data may also be used by us for conducting internal reviews and analysis to inter alia protect the integrity of the Platforms.

5. GDPR Compliance Section (for EEA users)

Your Data Rights (GDPR)

If you are located in the European Economic Area (EEA), you have the following rights under the General Data

Protection Regulation (GDPR):

- *Right to access the personal data we hold about you.*
- *Right to request correction or deletion of your data.*
- *Right to object to or restrict the processing of your data.*
- *Right to data portability.*
- *To exercise any of these rights, please contact us at info@simstar.co*

6. Sharing the Data

The few instances in which We shall share your Data with a third party are as follows:

- To respond to request(s) from a law enforcement or governmental agency or judicial, quasi-judicial or any other statutory or constitutional authority or by any law in force or regulation. We shall disclose the Data to law enforcement agencies, representatives of courts, governmental or public authorities, tax authorities, if and to the extent We are required to do so by law or where such disclosure is reasonably necessary to comply with our legal obligations.
- To comply with a valid legal request or to respond to any claim(s) asserted against Us, or to respond to or address any issue which may expose Us, You, or any other of our clients / visitors to any sort of legal liability. Where appropriate we will notify you regarding the legal requests, unless providing notice is prohibited by the legal process itself or if the same shall expose Us / You / any other client to a claim of obstruction of justice.
- To provide You with access to the Platform.
- To enforce and administer our Terms and Conditions, and / or this Policy and /or our agreements. To protect our rights, property and personal safety, and the rights, property or personal safety of our employees, members, or members of the public.
- To prevent, detect, mitigate, and investigate fraudulent or illegal activities related to use of the Platforms.

- To third parties involved in providing backend support and to Us, such as for the Platforms' maintenance and for storage of the Data – the third parties shall only be provided with limited access to Your Data that is strictly essential to them in order to perform their functions and all such usage shall be strictly in accordance with this Policy. These third-parties shall have and follow all reasonable security standards to safeguard Your Data.
- To provide you with newsletters, periodic updates and other communications such as relating to promotions, new products, any online / offline events, launches, etc., Your Data may be shared with our affiliates.

7. Miscellaneous

- We value your privacy and hence, we have taken all reasonable measures to ensure the safety of Your Data. We have employed various administrative, physical, and electronic safeguards, including but not limited to reasonable security procedures, to protect the confidentiality and integrity of Your Data.
- This Policy governs and applies only to the Data provided to Us through the Platform and does not cover any other information. By providing us with Your Data You accept the inherent security implications of sharing Your Data online, and You waive any right to seek legal relief from Us and / or the Platforms due to any misuse of your Data by Your continued usage of the Platforms which constitutes your acceptance of this risk.
- Notwithstanding anything contained in this Policy or elsewhere, We shall not be held responsible, liable for any loss, damage or breach ("Loss") of your Data, if such Loss is attributable to a Force Majeure Event. A "Force Majeure Event" shall mean any event that is beyond our reasonable control and shall include, without limitation, war, earthquakes, pandemics, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, insurrection, acts of government, computer hacking, computer crashes, breach of security and encryption, etc.
- This Privacy Policy shall be construed in accordance with laws of India and the jurisdiction to adjudicate upon all disputes in relation to this Privacy Policy shall exclusively be with the courts of Mumbai, India.
- When You provide us Your Data for the purposes of accessing the Website and / or utilizing Our services, You warrant and represent that the Data has been provided voluntarily and the same is and shall always be correct, current and updated. You also warrant and represent that you have all the rights, permissions, and consents for our consequent storage, collection, usage, transfer, access, and processing of the Data. If You do not provide your Data or subsequently withdraw Your consent for usage of the Data so collected, we shall discontinue the services for which the said Data was collected.



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- All Visitors, at all points of time, retain the right to review, modify, add, correct, delete or update your Data and Your account in accordance with the terms of this Policy. We may keep a copy of the earlier versions of the Data in Our records as mandated by law and for any further legal purposes.
- You can update / alter / modify / delete the Data shared with us by getting in touch with us at info@simstar.co. You agree and acknowledge that certain Data cannot be corrected or deleted or is prohibited to be deleted as required under any applicable law, law enforcement requests or under any judicial Proceedings.
- You can also get in touch with us at info@simstar.co if you wish to opt out of our communications list or if you no longer wish to receive communications / updates / offers from us.
- Our Grievance Officer is Ms. Vyoma Patel and she can be reached at info@simstar.co.

By agreeing to Privacy Policy, this also ensures you agree to all Terms and Conditions