

**PRIVACY POLICY**  
**TIPTOP DRIVERS PLATFORM**

**1. INTRODUCTION AND SCOPE**

This Privacy Policy (“Policy”) governs the manner in which TIPTOP DRIVERS, a brand operated by RAA Associate and its affiliates (hereinafter referred to as “Company”, “We”, “Us”, or “Our”), collects, processes, stores, uses, shares, and protects personal data of users accessing or using its mobile application, website, or any associated services (collectively referred to as the “Platform”). This Policy applies to all individuals including customers, drivers, vendors, visitors, and any other natural persons who interact with the Platform in any capacity.

The Company operates as a technology-based aggregator facilitating connections between independent drivers and customers seeking driving services. In this process, the Company may collect certain personal and sensitive personal data to ensure seamless service delivery, user authentication, safety, compliance with applicable laws, and improvement of user experience. This Policy is designed in compliance with applicable Indian laws including the Information Technology Act, 2000 and the Digital Personal Data Protection Act, 2023, and shall be interpreted in accordance with such laws.

By accessing or using the Platform, you acknowledge that you have read, understood, and consented to the collection, storage, processing, and transfer of your personal data in accordance with the terms set forth herein. If you do not agree with any part of this Policy, you are advised to discontinue use of the Platform immediately.

**2. DEFINITIONS**

For the purpose of this Policy, “Personal Data” shall mean any information that relates to an identified or identifiable individual, including but not limited to name, contact details, identification documents, location data, and financial information. “Sensitive Personal Data” shall include information such as government-issued identification numbers, biometric data (if any), financial account details, and any other category notified under applicable law.

“User” shall mean any individual who accesses or uses the Platform, including customers and drivers. “Driver” refers to independent service providers registered on the Platform to offer driving services, while “Customer” refers to individuals booking such services. “Processing” shall include collection, recording, storage, adaptation, retrieval, use, disclosure, or deletion of data.

This Policy should be read in conjunction with the Terms of Use, Driver Agreement, and any other applicable contractual documents governing the relationship between the Company and its users.

### 3. INFORMATION WE COLLECT

The Company collects various categories of personal data depending on the nature of interaction with the Platform. For customers, this may include name, mobile number, email address, location data, booking details, and payment information. For drivers, additional information such as driving license details, identity proof, background verification documents, bank account details, and performance-related data may be collected.

We may also collect device-related information such as IP address, device ID, operating system, browser type, and usage patterns to enhance platform functionality and security. Location data may be collected in real-time to facilitate service delivery, route tracking, and safety monitoring.

In addition to information directly provided by users, we may collect data through cookies, analytics tools, and third-party integrations. Users are informed that certain data is mandatory for providing services, and refusal to provide such data may limit access to certain features of the Platform.

### 4. PURPOSE OF DATA COLLECTION

The personal data collected by the Company is used for multiple legitimate purposes essential for the functioning of the Platform. These include user registration, identity verification, service matching between drivers and customers, booking management, payment processing, dispute resolution, and customer support.

Data is also used to ensure safety and security, including background verification of drivers, fraud detection, monitoring suspicious activities, and compliance with legal obligations. The Company may further use data for improving services, analyzing user behavior, developing new features, and enhancing overall user experience.

Marketing communications, promotional offers, and notifications may be sent to users based on their preferences, and users shall have the option to opt-out of such communications. The Company ensures that data processing is limited to purposes that are lawful, transparent, and necessary for the operation of the Platform.

### 5. LEGAL BASIS FOR PROCESSING

The Company processes personal data based on lawful grounds including user consent, contractual necessity, compliance with legal obligations, and legitimate business interests. When users register or use the Platform, they provide consent for the processing of their personal data in accordance with this Policy.

Processing may also be necessary for the performance of a contract between the user and the Company, such as facilitating driver services, processing payments, or resolving disputes. In certain cases, data may be processed to comply with statutory requirements, regulatory obligations, or law enforcement requests.

The Company ensures that all processing activities are conducted in a fair, transparent, and proportionate manner, balancing business needs with user privacy rights.

## 6. DATA SHARING AND DISCLOSURE

The Company may share personal data with third parties strictly on a need-to-know basis and in compliance with applicable laws. This includes sharing data between drivers and customers to facilitate bookings, communication, and service delivery. Data may also be shared with payment gateways, verification agencies, analytics providers, cloud service providers, and other vendors engaged by the Company for operational purposes. All such third parties are bound by confidentiality obligations and are required to implement appropriate data protection measures.

The Company may disclose personal data to government authorities, law enforcement agencies, or regulatory bodies when required by law or in response to valid legal processes. In case of business restructuring, merger, or acquisition, user data may be transferred subject to appropriate safeguards.

## 7. DATA RETENTION

The Company retains personal data only for as long as necessary to fulfill the purposes for which it was collected or as required under applicable law. Data related to user accounts may be retained for the duration of the account's existence and for a reasonable period thereafter for legal and operational purposes. Certain data such as financial records, transaction history, and compliance-related information may be retained for longer periods as mandated by law. Upon expiry of the retention period, data shall be securely deleted or anonymized in a manner that prevents identification of individuals.

Users may request deletion of their data, subject to legal and contractual limitations, and the Company shall take reasonable steps to comply with such requests.

## 8. DATA SECURITY MEASURES

The Company implements appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure. These measures include encryption, secure servers, access controls, firewalls, and regular security audits. Access to personal data is restricted to authorized personnel who require such access for operational purposes. Employees and contractors are bound by confidentiality obligations and undergo regular training on data protection practices.

While the Company strives to ensure robust security, users acknowledge that no system is completely immune to risks, and the Company shall not be liable for breaches beyond its reasonable control.

## 9. USER RIGHTS

Users have certain rights in relation to their personal data, including the right to access, correct, update, or delete their information. Users may also withdraw consent for data processing, subject to legal and contractual obligations. Users have the right to request information regarding the categories of data collected, the purposes of processing, and the entities with whom data is shared. Requests can be made through designated contact channels provided by the Company. The Company shall respond to such requests within a reasonable timeframe and in accordance with applicable laws, ensuring that user rights are respected and upheld.

## 10. COOKIES AND TRACKING TECHNOLOGIES

The Platform may use cookies, web beacons, and similar technologies to enhance user experience, analyze usage patterns, and improve service delivery. Cookies help in remembering user preferences, enabling faster access, and providing personalized content. Users have the option to manage or disable cookies through their browser settings; however, doing so may affect certain functionalities of the Platform. The Company ensures that cookies are used in a transparent manner and in compliance with applicable regulations. Third-party analytics tools may also use cookies to collect anonymized data for statistical purposes, helping the Company improve its services.

## 11. THIRD-PARTY LINKS AND SERVICES

The Platform may contain links to third-party websites or services that are not controlled by the Company. This Privacy Policy does not apply to such third-party platforms, and users are advised to review their respective privacy policies before sharing any personal data. The Company shall not be responsible for the privacy practices or content of third-party services, and any interaction with such platforms shall be at the user's own risk.

Integration with third-party services such as payment gateways or mapping services is essential for the functioning of the Platform, and data shared with such services shall be limited to what is necessary for operational purposes.

## 12. CHILDREN'S PRIVACY

The Platform is not intended for use by individuals below the age of 18 years, and the Company does not knowingly collect personal data from minors. If it is discovered that a minor has provided personal data without parental consent, the Company shall take appropriate steps to delete such information. Parents or guardians who become aware of such instances are encouraged to contact the Company for necessary action. The Company remains committed to protecting the privacy of children and ensuring compliance with applicable laws.

## 13. INTERNATIONAL DATA TRANSFERS

In certain cases, personal data may be transferred to servers or service providers located outside India for processing and storage. Such transfers shall be conducted in compliance with applicable data protection laws and subject to appropriate safeguards. The Company ensures that cross-border data transfers maintain the same level of protection as required under Indian law, and users consent to such transfers by using the Platform. Appropriate contractual and technical measures shall be implemented to safeguard data during such transfers.

## 14. GRIEVANCE REDRESSAL MECHANISM

The Company has established a grievance redressal mechanism to address user concerns regarding data privacy and protection. Users may contact the designated Grievance Officer with queries, complaints, or requests related to their personal data. The Grievance Officer shall acknowledge and resolve complaints within the timelines prescribed under applicable law. The Company is committed to ensuring transparency, accountability, and effective resolution of user concerns. Contact details of the Grievance Officer shall be made available on the Platform and updated from time to time.

## 15. CHANGES TO THIS PRIVACY POLICY

The Company reserves the right to modify or update this Privacy Policy at any time to reflect changes in legal requirements, business practices, or technological advancements. Users shall be notified of significant changes through the Platform or other appropriate means. Continued use of the Platform after such updates shall constitute acceptance of the revised Policy. Users are encouraged to review this Policy periodically to stay informed about how their data is being handled. In case of material changes affecting user rights, explicit consent may be obtained where required by law.

## 16. CONSENT AND ACCEPTANCE

By accessing or using the Platform, users expressly consent to the collection, use, storage, and processing of their personal data in accordance with this Privacy Policy. Such consent shall be deemed to be free, informed, specific, and unambiguous as required under applicable laws. Users acknowledge that the provision of services by the Company is contingent upon the collection and processing of certain personal data, and refusal to provide such data may limit access to the Platform. This Privacy Policy forms an integral part of the contractual relationship between the Company and its users, and any violation may result in suspension or termination of services.

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