

PRIVACY POLICY

“This Privacy Policy (“Policy”) applies to the website, mobile application, and all related services, features, content, and communications provided by Lynkcare Health Tech Private Limited, which offers the platform known as MedLynk (“MedLynk”, “Platform”, “we”, “us”, “our”). This Policy forms an integral part of the Terms of Use and any other policy or agreement published by us from time to time.”

By accessing, registering with, or using the Platform, you acknowledge that you have read and understood this Policy and consent to the collection, use, disclosure, storage, processing, transfer, and protection of your personal data in accordance with this Policy and applicable law, including the Digital Personal Data Protection Act, 2023 (“**DPDP Act**”) and other applicable data privacy and Data Protection laws in India, including the Digital Personal Data Protection Rules, 2025 (“DPDP Rules”).

1. Scope and application

This Policy applies to all users of the Platform, including Healthcare Providers, Healthcare Professionals, authorised representatives, account administrators, visitors, and any other person who accesses or uses the Platform. It applies to personal data processed through the Platform, whether collected online, through mobile applications, email, telephone, support channels, or otherwise in connection with our services.

For the purposes of this Policy, references to “personal data” mean digital personal data or such other information as may be protected under applicable law. Where the Platform processes information relating to health, professional qualifications, identity, contact details, account information, financial details, usage logs, or other information capable of identifying a natural person, such information will be handled in accordance with this Policy and applicable law

2. Our role

MedLynk is a technology-enabled intermediary platform that facilitates discovery, communication, scheduling, booking management, administrative workflows, and payment facilitation between Healthcare Providers and independent Healthcare Professionals. We do not own, operate, manage, or control healthcare establishments and do not provide medical services ourselves.

Depending on the context of processing, MedLynk may act as a data fiduciary, joint data fiduciary, or a processor/service provider acting on instructions of another entity, as applicable under law and contractual arrangements. For instance, we act as a data fiduciary in relation to account creation, platform security, and communications; we may act as a joint data fiduciary together with a Healthcare Provider where the purpose and means of processing (such as an Engagement) are determined jointly; and we act as a processor/service provider where we process personal data solely on the documented instructions of a Healthcare Provider or Healthcare Professional. In all cases, we will process personal data only for lawful purposes and only to the extent necessary for the relevant service, compliance requirement, or

contractual obligation, in accordance with the DPDP Act and DPDP Rules. **If MedLynk is notified as a Significant Data Fiduciary under the DPDP Act, we will additionally comply with the obligations applicable to such fiduciaries, including appointment of a Data Protection Officer and an independent data auditor and periodic Data Protection Impact Assessments, as may be required by law.**

3. Information we collect

We may collect the following categories of information:

- Identity information, including name, age, gender where relevant, photograph, and government-issued identification or registration numbers.
- Contact information, including email address, mobile number, address, and organisation details.
- Account information, including username, password, role, access history, and authentication records.
- Professional information, including qualifications, licences, registrations, certifications, specialisations, work profile, and related verification documents.
- Healthcare Provider information, including entity name, authorised signatory details, establishment details, onboarding documents, and billing details.
- Transaction and payment information, including booking details, invoices, platform fee records, settlement information, and payment references.
- Communications, including emails, in-app messages, support tickets, grievance submissions, call records, and notices
- Technical and usage information, including IP address, device identifiers, browser type, operating system, app usage, cookies, log files, and security alerts.
- Health-related or sensitive information, if and to the extent such information is voluntarily submitted or required for the operation of the services or engagement workflow.

We do not intentionally collect more data than is reasonably necessary for the purposes stated in this policy.

3.1 Health-related, professional and verification data – enhanced safeguards

Health-related information, and information relating to professional qualifications, registrations, licences, certifications and verification documents, will be accessed strictly on a need-to-know basis by authorised personnel, and will be subject to role-based access controls and the other safeguards described in Clause 10, in addition to the general safeguards applicable to personal data generally. Such information will be collected, used and retained only to the extent necessary for identity and credential verification, onboarding, facilitating an Engagement, and compliance with applicable professional council, regulatory, or statutory record-keeping requirements, and will not be used for unrelated commercial purposes. Where required under applicable law, we will seek your explicit consent prior to collecting or processing health-related information.

4. How we collect data

We collect personal data:

- Directly from you when you register, create or update an account, upload documents, communicate with us, or use the Platform.
- From Healthcare Providers, Healthcare Professionals, and their authorised representatives in connection with onboarding, verification, booking, and support.
- Automatically through the Platform, including cookies, log files, device data, analytics tools, and security systems.
- From third-party service providers such as payment gateways, KYC/KYB vendors, cloud hosting providers, messaging providers, and verification partners. Such third-party service providers are engaged following reasonable due diligence and are contractually bound to process personal data only on our instructions, to implement appropriate technical and organisational safeguards, and to maintain confidentiality, consistent with the requirements applicable to processors/service providers under the DPDP Act.
- From public records or other lawful sources where necessary for verification, fraud prevention, legal compliance, or protection of legitimate interests.

5. Purpose of processing

We process personal data for the following purposes:

- To create, verify, administer, and secure user accounts.
- To enable access to the Platform and its features.
- To facilitate discovery, matching, scheduling, booking, communication, and administrative workflows.
- To process payments, fees, invoices, reconciliations, tax-related obligations, and settlements.
- To verify identity, credentials, qualifications, authorisations, and legitimacy of users.
- To provide customer support, respond to requests, handle complaints, and manage grievances.
- To detect, prevent, investigate, and respond to fraud, misuse, abuse, cyber incidents, and security threats.
- To comply with applicable law, regulatory requirements, court orders, and lawful requests from public authorities.
- To maintain records, audits, legal claims, and business continuity functions.
- To improve the Platform, enhance user experience, analyse performance, and develop new features, subject to applicable law.
- To send operational messages, service alerts, security alerts, and legal notices.

6. Consent and lawful processing

Where the DPDP Act or any other applicable law requires consent, MedLynk will obtain consent that is free, specific, informed, unconditional, and unambiguous, indicated through

clear affirmative action, and capable of being withdrawn at any time with the same ease with which it was given. Prior to or at the time of seeking consent, we will endeavour to provide an itemised notice, in clear and plain language, describing the personal data proposed to be collected and the purpose of such processing, consistent with the notice requirements under the DPDP Act. Where processing is necessary for performance of a contract, compliance with a legal obligation, fraud prevention, security, or other lawful basis recognised under applicable law, including the legitimate uses recognised under the DPDP Act, we may process personal data without separate consent to the extent permitted.

If you choose not to provide certain personal data, or withdraw consent where processing depends on consent, we may not be able to provide some or all features of the Platform or complete the relevant service.

In addition to this Policy, we may provide concise, itemised privacy notices and consent-capture screens at the point of registration or onboarding, or at the point of collection of specific categories of personal data, so that you can make an informed decision before providing your consent. Where enabled under the DPDP Rules, you may also grant, manage, review, and withdraw your consent through a Consent Manager registered with the Data Protection Board of India.

7. Cookies and tracking

We use cookies, SDKs, pixels, and similar technologies to operate the Platform, authenticate users, remember preferences, measure traffic, analyse usage, improve performance, and support security functions. You may disable cookies through browser or device settings, but some features of the Platform may not function properly if cookies are disabled.

8. Disclosure and sharing

We do not sell personal data. We may disclose personal data only on a need-to-know basis and only for legitimate and lawful purposes, including to:

- Healthcare Providers and Healthcare Professionals, for booking, fulfilment, communication, and operational purposes.
- Service providers and vendors engaged by us for hosting, cloud infrastructure, analytics, security, communication, verification, payment processing, or support.
- Regulatory, government, judicial, and law-enforcement authorities where disclosure is required or permitted under law.
- Auditors, insurers, legal counsel, consultants, and professional advisers, where necessary for compliance, risk management, dispute handling, or legal defence.
- Any person or entity to whom you have expressly consented or authorised disclosure.

All such disclosures will be subject to confidentiality and security obligations as appropriate.

9. Cross-border transfers

Under Section 16 of the DPDP Act, the transfer of personal data outside India is permitted by default, save in respect of any country or territory that may be restricted by the Central Government by notification. Where personal data is transferred outside India, we will do so

only in accordance with applicable law, including any such restrictions as may be notified, and subject to such contractual, technical, and organisational safeguards as may be required. By using the Platform, you acknowledge that your personal data may be stored or processed in jurisdictions outside India where our service providers operate, provided such processing is permitted by law.

10. Security safeguards

We implement reasonable security practices and technical and organisational safeguards designed to protect personal data from unauthorised access, disclosure, alteration, misuse, loss, or destruction. Such safeguards may include access controls, role-based permissions, encryption, logging, monitoring, vulnerability management, vendor due diligence, and incident response procedures.

10.1 Personal data breach notification

In the event of a personal data breach, we will take reasonable steps to contain and remediate the breach, and will notify the Data Protection Board of India and affected Data Principals in the manner and within the timelines prescribed under the DPDP Act and DPDP Rules.

While we take reasonable precautions, no electronic transmission or storage system is completely secure. To the extent permitted by law, MedLynk shall not be liable for unauthorised acts beyond our reasonable control, provided we have complied with our legal and contractual obligations.

11. Retention and deletion

We retain personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected, to satisfy legal, regulatory, tax, audit, accounting, or contractual obligations, and to establish, exercise, or defend legal claims. When personal data is no longer required, it will be deleted, anonymised, or de-identified in accordance with our retention practices and applicable law.

12. Your rights

Subject to the DPDP Act, you may have the right to:

- Access information regarding your personal data and its processing.
- Correct, update, or complete inaccurate or incomplete personal data.
- Request erasure of personal data wherever permitted by law.
- Withdraw consent where processing is based on consent.
- Nominate another individual to exercise your rights in case of death or incapacity, where legally permitted.
- Raise grievances regarding the processing of your personal data.
- File a complaint with the Data Protection Board of India if you are not satisfied with the resolution of your grievance under Clause 13.

Requests may be subject to identity verification, legal exceptions, contractual obligations, and retention requirements.

13. Grievance redressal

If you have any complaint, concern, or request relating to this Policy or the processing of your personal data, you may contact our designated Grievance Officer/Privacy Contact using the details below. We will acknowledge and endeavour to resolve grievances within the timelines prescribed under the DPDP Rules. If you are not satisfied with the resolution of your grievance, you may thereafter file a complaint with the Data Protection Board of India, in accordance with the DPDP Act.

Grievance Officer / Privacy Contact

Lynkcare Health Tech Private Limited

Operating as MedLynk

Ground Floor, Shakthi Towers 1,

766 Anna Salai, Anna Road,

Chennai - 600002, Tamil Nadu, India

Email: Admin@medlynk.in

Support: Support@medlynk.in

Phone: +91 75500 21235

14. Children's data

The Platform is a professional platform intended for use by adult Healthcare Providers, Healthcare Professionals, and their authorised representatives, and is not intended for use by children (as defined under the DPDP Act, being an individual who has not completed the age of eighteen years) or by persons with a disability who have a lawful guardian. Where, in exceptional circumstances, we are required to process the personal data of a child or such person, we will obtain verifiable consent from the child's parent or lawful guardian before doing so, and will not process such personal data in a manner likely to cause any detrimental effect on the well-being of the child. We do not undertake tracking, behavioural monitoring, or targeted advertising directed at children. If we become aware that data has been collected in contravention of applicable law, we will take appropriate steps to delete or restrict such data.

15. Third-party services

The Platform may integrate with or contain links to third-party products and services such as payment gateways, verification tools, communication systems, hosting providers, and analytics tools. The privacy practices of such third parties are governed by their own policies, and we are not responsible for their independent processing of personal data except to the extent required by applicable law or contract.

16. Policy updates

We may amend or update this Policy from time to time to reflect changes in law, technology, business operations, security practices, or platform features. The updated Policy will be published on the Platform with a revised effective date, and continued use of the Platform after such publication will constitute acknowledgment of the updated Policy to the extent permitted by law.

17. Contact details

If you have any questions regarding this Policy or our privacy practices, please contact us at:

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