



FOHOW HEALTHCARE PRIVATE LIMITED

2ND FLOOR, HOUSE NO. 213, GURUDWARA ROAD, SOUTH CITY

1,

GURUGRAM HARYANA, 122001

CIN: U47990HR2025PTC133261

Email: [dr.singh@fohow.com] | Phone: [+91-8802856563]

Privacy Policy

As per Consumer Protection (Direct Selling) Rules, 2021

Effective Date: 18 February 2026; Last Updated: 18 February 2026

1. INTRODUCTION

Fohow Healthcare India Private Limited (hereinafter referred to as 'Fohow', 'Company', 'we', 'us', or 'our'), having its registered office at Unit Nos 213, 2nd Floor, Soutcity 1, Gurugram -122001, is committed to protecting the privacy and personal information of our direct sellers, distributors, customers, and website visitors (collectively referred to as 'you' or 'users').

This Privacy Policy is prepared in accordance with the Information Technology Act, 2000, and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Consumer Protection Act, 2019, the Consumer Protection (Direct Selling) Rules, 2021, and other applicable laws and regulations of India.

By registering as a direct seller/distributor with Fohow, using our services, accessing our website (<https://india.hiwavo.com/>), mobile applications, or engaging with our business in any manner, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy.

2. INFORMATION WE COLLECT

2.1 Personal Information

We collect the following categories of personal information:

For Direct Sellers/Distributors:

- Full name, date of birth, gender
- Residential and correspondence address
- Mobile number, email address, and alternate contact details
- PAN card number, Aadhaar number (as per regulatory requirements)
- Bank account details for commission/income payment
- Photograph and identity documents
- Educational qualifications and occupation details

- Nominee details for succession purposes
- Sponsor/referrer information and genealogy tree details
- Business performance data, sales records, and commission details
- Training attendance and certification records

For Customers/End Users:

- Name, contact number, and email address
- Shipping and billing address
- Order history and purchase preferences
- Payment and transaction information
- Product reviews and feedback

For Website Visitors:

- IP address, browser type, and device information
- Cookies and tracking data (see Cookie Policy)
- Pages visited, time spent, and navigation patterns
- Referral source and exit pages

2.2 Sensitive Personal Data

We may collect sensitive personal data including:

- Financial information (bank account details, payment information)
- Passwords and security credentials (stored in encrypted form)
- Health-related information (only if voluntarily provided for product recommendations)

We do not intentionally collect biometric information, medical records, or sexual orientation data.

2.3 Information from Third Parties

We may receive information from:

- Payment gateway providers and banks
- Logistics and courier partners
- Your sponsor/referrer in the network
- Government databases for KYC verification
- Social media platforms (if you choose to link accounts)

3. PURPOSE OF COLLECTING INFORMATION

We collect and use your personal information for the following purposes:

3.1 Direct Selling Business Operations:

- a. Registration and onboarding of direct sellers/distributors
- b. Verification of identity and KYC compliance
- c. Maintenance of genealogy and network structure
- d. Calculation and disbursement of commissions, bonuses, and incentives
- e. Tracking of sales performance and business achievements
- f. Recognition and reward programs
- g. Communication regarding business opportunities and training

3.2 Customer Service and Transactions:

- a. Processing orders and delivering products
- b. Payment processing and transaction verification
- c. Customer support and grievance redressal
- d. Product returns, refunds, and warranty services
- e. Sending order confirmations, invoices, and delivery updates

3.3 Legal and Regulatory Compliance:

- a. Compliance with Consumer Protection (Direct Selling) Rules, 2021
- b. Maintaining statutory registers and records
- c. Tax compliance and TDS deduction
- d. Prevention of fraud, money laundering, and illegal activities
- e. Response to legal notices, court orders, and government authorities

3.4 Marketing and Communication:

- a. Sending promotional offers, product launches, and company updates
- b. Conducting surveys and feedback collection
- c. Personalized product recommendations
- d. Newsletter and business opportunity information

Note: You may opt-out of marketing communications at any time by clicking the 'unsubscribe' link in emails or contacting us.

3.5 Analytics and Improvement:

- a. Website and app performance analysis

- b. Understanding user behavior and preferences
- c. Improving products, services, and user experience
- d. Business intelligence and strategic planning

4. DATA SHARING AND DISCLOSURE

We respect your privacy and do not sell, rent, or trade your personal information to third parties for their marketing purposes. However, we may share your information in the following circumstances:

4.1 Within Fohow Network:

- With your upline sponsors/mentors for business support and training
- With your downline distributors (limited contact information only)
- In the company's genealogy system visible to authorized users

4.2 Service Providers and Partners:

- Payment gateways and banks for transaction processing
- Logistics and courier partners for product delivery
- IT service providers for hosting, maintenance, and security
- Marketing agencies for promotional campaigns (anonymized data)
- Customer support service providers
- Legal, accounting, and audit firms (under confidentiality obligations)

4.3 Legal and Regulatory Authorities:

- Government agencies, regulators, and law enforcement
- Tax authorities for tax compliance
- Courts and tribunals pursuant to legal orders
- Consumer forums and dispute resolution bodies

4.4 Business Transfers:

In the event of merger, acquisition, reorganization, or sale of assets, your information may be transferred to the successor entity, subject to the same privacy protections.

4.5 With Your Consent:

We may share information with other parties when you explicitly consent or direct us to do so.

5. DATA SECURITY MEASURES

We implement reasonable security practices and procedures to protect your personal information from unauthorized access, disclosure, alteration, or destruction:

5.1 Technical Safeguards:

- SSL/TLS encryption for data transmission
- Encrypted storage of sensitive data including passwords and financial information
- Firewall protection and intrusion detection systems
- Regular security audits and vulnerability assessments
- Multi-factor authentication for sensitive operations
- Secure backup and disaster recovery mechanisms

5.2 Administrative Safeguards:

- Role-based access control (employees access only necessary data)
- Confidentiality agreements with employees and service providers
- Regular security training and awareness programs
- Incident response and breach notification procedures
- Background verification of employees handling sensitive data

5.3 Physical Safeguards:

- Restricted access to servers and data centers
- CCTV monitoring and physical security controls
- Secure disposal of physical documents containing personal data

Despite our best efforts, please note that no method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your information, we cannot guarantee absolute security.

6. DATA RETENTION

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

6.1 Retention Periods:

- Active distributor accounts: Duration of active membership plus 7 years after termination/resignation
- Customer transaction data: 7 years from the date of transaction (as per tax laws)
- Financial records: 7 years (as per Income Tax Act and Companies Act)
- Grievance and complaint records: 3 years from resolution
- Marketing communications: Until you opt-out or request deletion
- Website logs and analytics: 12-24 months

After the retention period expires, we securely delete or anonymize your personal information, unless retention is necessary for legal obligations, dispute resolution, or enforcement of our agreements.

7. YOUR RIGHTS AND CHOICES

Under Indian law, you have the following rights regarding your personal information:

7.1 Right to Access:

You have the right to request and obtain a copy of the personal information we hold about you.

7.2 Right to Correction:

You may request correction of inaccurate, incomplete, or outdated personal information. You can update most information through your account dashboard or by contacting us.

7.3 Right to Withdrawal of Consent:

You may withdraw consent for processing your personal information where such processing is based on consent. However, this may affect your ability to use certain services.

7.4 Right to Data Portability:

You may request your personal information in a structured, commonly used, and machine-readable format.

7.5 Right to Lodge Complaint:

You have the right to lodge a complaint with the Grievance Officer (details below) or with appropriate regulatory authorities if you believe your privacy rights have been violated.

7.6 Right to Opt-Out:

- Marketing communications: Click 'unsubscribe' in emails or SMS
- Cookies and tracking: Use browser settings or opt-out tools
- Data sharing: Request restriction by contacting the Grievance Officer

Note: Some rights may be subject to legal limitations. For example, we may retain information required for legal compliance, dispute resolution, or fraud prevention even after you request deletion.

8. COOKIES AND TRACKING TECHNOLOGIES

Our website uses cookies and similar tracking technologies to enhance user experience and analyze website traffic.

8.1 Types of Cookies:

- Essential Cookies: Necessary for website functionality (login, shopping cart)
- Performance Cookies: Collect anonymous data on website usage and performance
- Functional Cookies: Remember your preferences and settings
- Advertising Cookies: Deliver relevant advertisements based on browsing history

8.2 Third-Party Cookies:

We may use third-party analytics services like Google Analytics to understand website usage patterns. These services may place cookies on your device.

8.3 Managing Cookies:

You can control cookies through your browser settings. However, disabling cookies may affect website functionality and user experience.

9. DIRECT SELLING SPECIFIC PROVISIONS

In compliance with the Consumer Protection (Direct Selling) Rules, 2021:

9.1 Transparency in Network Structure:

- Your position in the genealogy tree is visible to your upline and downline
- Commission calculations and business performance data are accessible through your dashboard
- All compensation plan details and earning disclosures are available in the Distributor Manual

9.2 Consent for Communication:

- By joining as a direct seller, you consent to receive business-related communications
- You consent to your contact information being shared with your sponsor/mentor for training purposes
- You may opt-out of promotional communications but will continue receiving transactional updates

9.3 Data in Case of Dispute:

- Personal information may be shared with consumer forums, courts, or arbitrators in case of disputes
- We maintain records of all transactions, communications, and business activities for dispute resolution purposes

9.4 Cooling-Off Period and Withdrawal:

- If you exercise your cooling-off period rights, we will delete or anonymize non-essential data within 90 days
- Upon voluntary resignation, your account will be deactivated but historical data will be retained as per legal requirements

10. CHILDREN'S PRIVACY

Our services are not intended for individuals under 18 years of age. We do not knowingly collect personal information from children. Direct seller registration is restricted to adults (18+ years).

If you are under 18 years, you may use our website only with the involvement and consent of a parent or legal guardian. If we discover that we have inadvertently collected information from a child under 18, we will delete such information promptly.

Parents or guardians who believe we have collected information from a child under 18 should contact our Grievance Officer immediately.

11. INTERNATIONAL DATA TRANSFER

Your personal information is primarily stored and processed in India. However, in certain circumstances, your information may be transferred to, stored, or processed outside India for the following purposes:

- Cloud storage services hosted on international servers
- Payment processing through international payment gateways
- Technical support and IT services from global vendors
- Communication with Fohow's international headquarters or affiliates

When we transfer data internationally, we ensure adequate safeguards are in place, including contractual clauses, security standards, and compliance with applicable data protection laws.

12. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, legal requirements, or business operations. The updated policy will be effective from the date mentioned at the top of this document.

Material changes will be notified through:

- Email notification to registered users
- Prominent notice on our website homepage
- In-app notification (if using mobile app)
- SMS to registered mobile numbers

Your continued use of our services after notification of changes constitutes acceptance of the revised Privacy Policy. We encourage you to review this policy periodically.

13. GRIEVANCE REDRESSAL MECHANISM

In accordance with the Information Technology Act, 2000, and the Consumer Protection (Direct Selling) Rules, 2021, we have appointed a Grievance Officer to address your privacy concerns and complaints.

Grievance Officer Contact Details:

Name: [Rekha Singh]

Designation: Grievance Officer

Email: dr.singh@fohow.com

Phone: +91-120-4903441

Address: Unit Nos 213, 2nd Floor, Soutcity 1, Gurugram, Haryana -122001

Grievance Resolution Process:

1. Submit your complaint in writing via email or registered post
2. Include your name, contact details, distributor ID (if applicable), and detailed description of the grievance
3. The Grievance Officer will acknowledge receipt within 48 hours
4. Investigation and resolution will be completed within 30 days (or as per applicable law)
5. You will receive a written response with the outcome and actions taken

If you are not satisfied with the resolution, you may escalate the matter to:

- Consumer Helpline: 1800-11-4000 or 14404
- National Consumer Helpline Portal: consumerhelpline.gov.in
- State Consumer Disputes Redressal Commission
- Ministry of Consumer Affairs, Food & Public Distribution

14. CONTACT INFORMATION

For any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

Company Name: Fohow Healthcare Private Limited

Registered Office:

Unit Nos 213, 2nd Floor, Soutcity 1, Gurugram, Haryana -122001

Corporate Identification Number (CIN): U47990HR2025PTC133261

Email: dr.singh@fohow.com

Phone: +91-11-4903441

Website:<https://india.hiwavo.com/>

15. ACKNOWLEDGMENT AND CONSENT

By registering with Fohow Healthcare India Private Limited, using our services, or accessing our website, you acknowledge that:

1. You have read and understood this Privacy Policy in its entirety
2. You consent to the collection, use, storage, and disclosure of your personal information as described in this policy
3. You understand your rights and the mechanisms available for grievance redressal
4. You authorize us to share your information within the direct selling network as necessary for business operations
5. You will keep your login credentials confidential and notify us immediately of any unauthorized access

***** END OF PRIVACY POLICY *****

This Privacy Policy is governed by the laws of India and subject to the exclusive jurisdiction of courts in New Delhi.