

PRIVACY POLICY

1. General

Appistoki India Private Limited (the “**Company**”) regards privacy as a key consideration and takes the privacy of the information in relation to the Company’s employees, vendors, clients or customers (collectively the “**Data Subjects**”) seriously. This privacy policy (the “**Policy**”) explains how the Company collects, receives, possesses, stores, uses, shares, discloses, protects, deals, handles or otherwise processes the personal information including sensitive personal data and information and any other data of the Data Subjects shared with the Company (“**Personal Information**”) when using the Company’s website, employing the Company’s services, or through any other means or sources, in compliance with the applicable data privacy laws. This Policy applies to all current and former users accessing or using the Company’s website, visiting the Company’s office/branch or otherwise sharing information with the Company through any other means. By accessing or using the Company’s website or by otherwise giving the Company Personal Information, the Data Subjects are considered to have read and understood and agreed to the practices outlined in this Policy.

2. Type of Personal Information Collected and Mode of Collection

(a) Type of Personal Information Collected

The Company may collect the following types of Personal Information:

- Information collected as part of visiting and using the Company’s websites such as Internet Protocol (IP) address, demographics, operating system, device information, telemetry data and browser type and information collected via cookies or similar tracking technologies.
- Personal information – This information can be associated with a specific person and could be used to identify that specific person whether from that data, or from the data and other information that the Company has, or is likely to have access to, and includes personal and contact details, such as, name, title, e-mail address, phone numbers, address, designation, gender, company/organization, industry, location, LinkedIn profiles/URLs (or similar professional data set). It does not include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.
- Login credentials, such as username and passwords, used while registering for any the Company’s applicable services.
- [Audio-visual information such as profile pictures, photographs or images captured, video recordings (if enabled), when attending any of the Company’s events, webinars, etc.]
- Queries, comments, or feedback submitted, including any correspondence made with the Company.
- Searches and browsing information.

- Preferences relating to marketing communications, interest areas, subscription details, etc.
- Additionally, certain data points based on the categories of Data Subject and their relationship with Company may also be collected.

(b) *Source of Personal Information*

- Submitted directly by the Data Subjects to the Company through forms, applications, correspondences etc., either online or offline.
- Shared with the Company's employees' or affiliates.
- Public websites and social media, including publicly accessible profiles.
- Information automatically collected upon using the Company's website which may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies.

(c) *Mode of Collection of Personal Information*

While collecting Personal Information directly from the Data Subjects, the Company or any person on its behalf will take such steps as are, in the circumstances, reasonable to ensure that the Data Subject has knowledge of the:

- fact that Personal Information is being collected;
- purpose for which the Personal Information is being collected;
- intended recipients of the Personal information; and
- Name and address of (i) the agency that is collecting the Personal Information; and (ii) the agency that will retain the Personal Information.

3. Purpose of Collection and Usage of Personal Information

The Company collects, processes and shares Personal Information only for legitimate purposes which include but are not limited to:

- Providing products and services;
- Conducting market research and surveys with the aim of improving products and services and monitoring and improving the Company's website and its content;
- Sending information to the Data Subjects about the products and services of the Company for marketing purposes and promotions, for which appropriate consent is taken;
- Complying with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement, or court order, as well as any contractual obligation pursuant to agreements between the Company and any authority, regulator or enforcement agency or body or any request coming from said entities;
- Establishing, exercising, or defending legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings;

- Surveillance of premises;
- To process requests and reply to queries; and
- For any other purpose with appropriate consent of the Data Subjects.

4. Basis of Processing Personal Information

Under the applicable privacy and data protection laws, Personal Information may be processed subject to: (i) consent; and (ii) legitimate grounds for collection and processing of Personal Information.

(a) *Consent*

The Company requests the Data Subjects for consent to process the Personal Information of the Data Subjects before collecting such data, including consent for sharing such Personal Information with third-party service providers on a need-to-know basis and in accordance with paragraph 5(b) below.

The Company will seek consent to collect and process Personal Information of the Data Subjects when:

- such information is collected for a lawful purpose connected with a function or activity of the Company or any person on its behalf; and
- the collection of the sensitive personal data or information is considered necessary for that purpose.

Such consent may be withdrawn by the relevant Data Subject at any point, however, a withdrawal shall not impact personal data processing if such processing is in compliance with applicable laws under a legitimate ground.

(b) *Legitimate grounds*

The Company may process Personal Information to comply with its legal obligations including under applicable laws, protect its legal rights, seek remedies, and defend itself against claims.

(c) *Performance of a contract*

The Company may process Personal Information for the performance of a contract to which the Data Subject is a party.

5. Disclosure and Sharing of Personal Information

The Personal Information shared by Data Subjects with the Company may be disclosed in the following circumstances:

(a) *Within the Company*

Personal Information may be shared within the Company to authorized personnel, strictly on a need-to-know basis, in accordance with the Company's internal policies and procedures. Such sharing will be done solely for the purpose for which the Personal Information was collected.

(b) *Third party(ies)*

Personal Information may be shared with third-party service providers or processors engaged by the Company to assist in the provision of services, operations, or other business activities. The Company will ensure that such third parties implement adequate safeguards to protect the Personal Information. The data shared with third parties will be used, stored, and processed exclusively for the purposes for which it was provided and such data will not be further disclosed without appropriate authorization.

(c) *Authorities*

The Company may share Personal Information, without obtaining of the relevant Data Subject or without notifying the relevant Data Subject, with: (a) governmental, statutory, regulatory, executive, law-enforcement, investigating or judicial/ quasi-judicial authorities, departments, instrumentalities, agencies, institutions, boards, commissions, courts, tribunals (“**Authorities**”), who ask for such Personal Information including by way of an order, direction, etc; or (b) any person, where disclosure is necessary for compliance of any legal or regulatory obligation. Such Personal Information may also be disclosed to the Authorities in the event there is a gross violation of the Company's policies, applicable laws and/or if it affects the Company's property, rights and reputation.

(d) *Transfer of business*

In the event of a corporate restructuring, including but not limited to a merger, amalgamation, acquisition, transfer of assets, liquidation, bankruptcy, or any other change of control, the Company may disclose and transfer Personal Information to the entity succeeding or acquiring control of the Company.

6. Reasonable Security Practices and Procedures

The Company has implemented robust security practices, standards and measures to ensure that Personal Information is protected from unauthorised access or use. The Company complies with the international standard IS/ISO/IEC 27001 on “Information Technology – Security Techniques – Information Security Management System – Requirements”. The Company adheres to widely recognized industry standards to safeguard Personal Information, both during its transmission and after receiving it.

In the event of an information security breach, the Company or a person on its behalf will be required to demonstrate, as and when called upon to do so by the agency mandated under

applicable law, that they have implemented security control measures as per their documented information security program and information security policies. The Company undertakes audit of reasonable security practices and procedures by an auditor at least once a year or as and when the Company undertakes significant upgradation of its process and computer resource.

The Company will not be liable for any unauthorized disclosure of Personal Information resulting from transmission errors, third-party access, or other circumstances beyond the Company's control. Data Subjects are responsible for maintaining the confidentiality and security of their Personal Information, and are advised to share such information only with verified and trusted websites, platforms, or authorized representatives of the Company.

7. Policy concerning Personal Information of Children and Persons with Disability

The Company is committed to protecting the privacy and safety of children and persons with disabilities. In certain circumstances, the Company may process personal data of children and persons with disabilities for the purposes specified in this Policy. The Company will obtain appropriate consent from parents or legal/lawful guardians, as the case may be, in accordance with the relevant legal requirements for processing of Personal Information of children or persons with disability. The Company will take reasonable endeavors to ensure that: (i) the collection, use, and disclosure of such Personal Information is limited to what is necessary for the intended purposes and is done in a secure manner; and (ii) adequate measures are implemented to process such Personal Information in compliance with applicable data privacy regulations of India.

In case of any grievances in relation to collection, processing and usage of Personal Information of children or persons with disability, the Data Subject may contact the Grievance Officer in accordance with paragraph 10 of this Policy.

8. Retention of Personal Information

The Company will process and retain Personal Information securely for no longer than is necessary to fulfil the purposes for which it was collected, or as required under applicable laws. Once the purpose of collection of the relevant Personal Information is fulfilled, the Company will ensure that such Personal Information is deleted, archived, or securely disposed of.

9. Changes in Privacy Policy

The Company reserves the right to amend or update this Policy periodically, including in response to changes in applicable laws. Any such updates will be published on the Company's website.

In the event that any court or competent authority determines that any provision of this Policy, or any part thereof, is invalid, illegal, or unenforceable, such provision or part thereof shall be

deemed to be severed from this Policy to the extent necessary, without affecting the validity and enforceability of the remaining provisions of the Policy.

10. Whom to Contact

In the event the Data Subjects have any discrepancies, grievances or queries in relation to the Policy or with respect to processing of their Personal Information, they may contact the designated Grievance Officer at the contact details provided below. The Company will address and resolve such grievances expeditiously, and within one month from the date of receipt of the grievance.

Grievance Officer

Name: Shreedhar R

Phone Number: +91 99867 04850

Email address: shreedhara@appistoki.com

