

# **PRIVACY POLICY**

We at VA Tech Ventures Private Limited (“VA Tech”) are committed to protecting and respecting Your privacy. This Privacy Policy (“**Policy**”) sets out how We collect, use, share and otherwise process information which identifies You or is associated with You (“**Personal Information**”) in connection with Your relationship with Us.

This Policy also sets out a procedure for safeguarding, storing, and utilization of Personal Information, as well as ways in which You can access and update Your Personal Information and make certain choices about how Your Personal Information is used by Us. We will not use or share Your Personal Information with anyone except as described in this Policy.

Please read this Policy carefully to understand Our views and practices regarding Your Personal Information and how We will treat it.

For the purpose of this Policy, the terms 'Us', 'Our' or 'We' refers to VA Tech with Our registered office at 3<sup>rd</sup> Floor, Delta Block, Sigma Soft – Tech Park, No. 7 Whitefield Main Road, Ramagodanahalli, Varthur Hobli, Bangalore, Karnataka 560066, India. The term 'You' or 'Your' or 'User' refers to (i) a visitor of Our Website, <https://vatechventures.com/> (the “**Website**”), or (ii) User or potential User of VA Tech’s software, provided on VA Tech’s mobile application, the Website or through web-plugins (the “**Services**”). The term Customer in this Policy refers to the entity entering into agreement with VA Tech for its technology services.

## **1. Collection of Personal Information**

- A. When You access the Website, the Personal Information that We directly collect from You includes:
  - a) Telephone number
  - b) E-mail address
  - c) Any other Personal Information that You provide Us while accessing Our Website.
- B. We may also receive Your Personal Information while You access our Website indirectly as follows:
  - a) IP address(es)
  - b) Information about Your device
  - c) When You use or view Our Website(s), information is collected via Your browser’s cookies as described in clause 2 herein.
- C. We may also receive Your Personal Information while You use Our Services indirectly as follows:
  - a) When use the Service(s), We automatically collect information on the type of device You use and the operating system version

## **2. Cookies:**

You can browse Our Website without telling Us Your name, address, or personal details. However, some of our web pages may track certain Personal Information about You based on Your behaviour on Our Website. This information may include the URL that You just came from (whether this URL is related to our Services or not), which URL You next go to (whether this URL is related to Our Services or not), Your browser information, and Your IP address. We may use data collection devices on Our Website and Services such as “**Cookies**” on certain aspects to help analyse inter alia Our web page flow, measure promotional effectiveness, and promote trust and safety. **Cookies** refer to small files placed on Your hard drive that assist Us in providing Our Services. We offer certain features that are only available through the use of a “Cookie”. You are always free to disable Our cookies at any time by using Your browser options, however if You turn off Cookies You may not be able to use certain features on the Website or the Services, for which, We shall not be responsible. The Cookies We use can be categorised as:

- 1. Essential Cookies: We set essential Cookies that enable core functionality such as security, network management, and accessibility. You may not opt-out of these Cookies. However, You may disable these by changing Your browser settings, but this may affect how the Website(s) functions.

2. **Analytics, Customisation and Advertising Cookies:** We set these Cookies to help Us improve Our Website(s) by collecting and reporting information on how You use it. The Cookies collect information in a way that does not directly identify anyone.

When You visit the Website(s), a Cookie banner will be displayed providing additional information about Cookies and options to opt out of non-essential Cookies or similar tracking technologies as required by applicable laws. You can find out more about Cookies by following this link: <https://ico.org.uk/for-the-public/online/cookies/> Additionally, You can also learn about our Cookies Policy and see Our Cookie list by following this link: [Cookie Policy](#)

### **3. Third-Party Websites:**

When You are using Our Website, You may be directed to, or come across links to, other websites that are operated and controlled by third parties that We do not control, and You access these websites at Your own risk. We provide links to third-party websites for your convenience only, any links to third-party websites do not imply an endorsement by Us to that third-party website. Clicking on links to third-party websites may allow such a third party to collect Personal Information about You. We do not control the use of cookies by third parties nor are We responsible for the contents of any third-party website, including the privacy practices employed by any of these third parties. When You leave the Website, We encourage You to read the applicable privacy statements of that third-party websites to determine how they will handle Your Personal Information before submitting any Personal Information to such third parties.

### **4. Legal Basis for collection and processing of Personal Information:**

We will normally collect Personal Information from You only, where the processing is in Our legitimate interests and not overridden by Your data protection interests or fundamental rights and freedoms, or where We have Your consent. In some cases, We may also have a legal obligation to collect Personal Information from You. If We process Personal Information based on Your consent, You may withdraw Your consent at any time.

Notwithstanding anything contained elsewhere, if You are a data subject from the European Economic Area, Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which We collect it.

If You have questions or need further information concerning the legal basis on which We collect and use Your Personal Information, please contact Us using the contact details provided under clause 13.

### **5. Use of Personal Information**

#### **A. Users of the Services**

##### *a) Signing in and authentication:*

We may use the Personal Information collected from You through single sign on services to authenticate Your identity and will help You sign in into the Services.

##### *b) Analysis by third-party(ies)*

We may use the Personal Information collected from You to improve Our products and Services, by way of sharing such information with third parties for the purposes of analysis. In the event that We share Your Personal Information with third parties, We require all third parties to respect the security of Your Personal Information and to treat it in accordance with the law, and such third parties will be contractually restricted from using Your Personal Information in any manner other than in helping Us;

##### *c) Promotional Emails or Messages*

We may periodically send promotional emails or messages about new services, special offers, or other information which We think You may find interesting using the email address and phone numbers which You have provided. You may, at any time, modify Your subscription preferences;

##### *d) Customer Service*

We may use Your Personal Information to resolve disputes that may arise with the use of Our Services, help promote a safe service to all the Users, measure consumer interest in Our Services, detect and protect Us against error, fraud and other criminal activity.

e) Troubleshooting

We may use Your IP address to help diagnose problems with Our server, and to administer the Website.

f) Carry out Our obligations

We may collect Your Personal Information to carry out Our obligations arising from any agreements entered into between You, or Your employer, and Us, such as allowing Our employer clients to evaluate Your usage of the Services. We will use the Personal Information We collect directly from You, information about how You use the Service and information about how You connect to the Service for this purpose.

g) Notification

We may collect Your Personal Information to notify You about changes to the Service and address complaints, comments, and issues You have in relation to Your use of the Service.

h) Prevent illegal activities

We may also collect Personal Information from You to prevent, detect and investigate illegal activities, breaches of any agreements entered into between You and Us and threats to the security of the Service. In the event that any Personal Information is compromised as a breach of security, We will promptly notify You in compliance with applicable law.

Other than the Personal Information collected under clause 1 and for the purposes set forth above for which VA Tech shall act as the Data Fiduciary/Controller, for any other processing of Personal Information collected from a User, VA Tech will only act as a processor and such processing will be governed by the agreement between VA Tech and the Customer. In such cases, the User's data privacy questions and requests should be submitted to the Customer in its capacity as the User's Data Fiduciary/Controller. If the User is an individual who interacts with a Customer using Our Services, the User will be directed to contact Our Customer for assistance with any requests or questions relating to their Personal Information. We are not responsible for the Customer's privacy or security practices which may be different from this notice. Customers to Our Services are solely responsible for establishing policies for and ensuring compliance with all applicable laws and regulations, as well as any and all privacy policies, agreements, or other obligations, relating to the collection of Personal Information in connection with the use of Our Services by Users.

**B. Users of Website**

a) Customization

From time to time, We may use Your Personal Information to customize Our Website according to Your interests.

b) Troubleshooting

We may use Your IP address to help diagnose problems with Our server and to administer the Website.

c) Promotional Emails or Messages

In case You provide Us with Your email or telephone number at the time of accessing Our Website, We may periodically send promotional emails or messages about new services, special offers, or other information which We think You may find interesting.

**6. Children's Personal Information:**

Our Website and Services are not intended for children under the age of 16. We do not knowingly collect Personal Information from children under the age of 16. If You are under 16 years of age, please do not use or provide any information on Our Website or through any of its features. If We learn We have collected or received Personal Information from a child under 16 years of age, We will delete that information.

If You believe We might have any information from or about a child under the age of 16, please contact Us at [privacy@vatechventures.com](mailto:privacy@vatechventures.com).

**7. Where We store Your Personal Information:**

Your Personal Information which We have collected may be stored and processed in India or any other country in which VA Tech or its subsidiaries, affiliates or service providers maintain facilities. We will ensure that the recipient of Your Personal Information offers an adequate level of protection that is at least similar to that which is provided under applicable data protection laws.

**8. Disclosure of Your Personal Information:**

We may disclose Your Personal Information to third parties:

- a) In the event that We sell or transfer Our business or assets (in part or whole), in which case We may have to disclose Your Personal Information to the buyer or recipient of such business or assets. Such buyer or recipient shall be informed of the obligations of privacy as under this Policy and applicable law and shall be required to maintain the same norms of privacy as stated herein. You will be informed via email and/or a prominent notice on Our Website of any change in ownership or uses of Your Personal Information, as well as any choices You may have regarding Your Personal Information. We will endeavour that the transferee who is the recipient of Personal Information commits to privacy measures which are substantially similar to the measures under this Policy.
- b) We share Personal Information with Our third-party service providers that host and maintain the Our Website(s), applications, backup, storage, payment processing, analytics, marketing and promotions and other services in compliance with applicable laws. These third-party service providers may have access to or Process Your Personal Information for the purpose of providing these Services to Us.
- c) In order to respond to a subpoena, summons, court order or other legal duty or obligation, requests or demands from law enforcement and government authorities and regulators), or as required by applicable laws as amended from time to time.
- d) In order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud, illegal transactions and situations involving potential threats to the physical safety of any person or to prevent financial loss to any person or entity, including Us, Our customers, clients, and other related parties.

**9. Data Retention:**

- a) We retain the Personal Information collected where an ongoing legitimate business requires retention of such Personal Information.
- b) In the absence of a need to retain Personal Information under clause 9(a) above, We will securely store Your Personal Information and isolate it from any further Processing until deletion is possible.
- c) Your Personal Information that forms part of the Customer data will be retained on the basis of the terms of the agreement between Us and the Customer.

**10. Rights of Users**

You are entitled to the following rights:

- a) If We have collected and processed Your Personal Information with Your consent, then You can withdraw Your consent at any time. Withdrawing Your consent will not affect the lawfulness of any processing We have conducted prior to Your withdrawal, nor will it affect processing of Your Personal Information conducted in reliance on lawful processing grounds other than consent. Where You

withdraw Your consent, You acknowledge that We would not be able to provide the service for which such consent is withdrawn.

- b) You have the right to opt-out of marketing communications We send You at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails We send You. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please Contact Us.
- c) You can request Us for deletion and erasure of Your Personal Information.

In the event that You would like to access, correct, delete, or object to any inaccuracies of the Personal Information provided by You, or to otherwise exercise any of Your rights in relation to Your Personal Information, You may send Us an email at [privacy@vatechventures.com](mailto:privacy@vatechventures.com) detailing Your request.

We will aim to respond to all legitimate requests relating to Your rights above within one month of receipt of Your request. Occasionally it may take Us longer than one month if Your request is particularly complex or if You have made a number of requests. In this case, We will notify You and keep You updated.

We may need to request specific information from You to help Us confirm Your identity and to ensure Your right to access Your Personal Information (or to exercise any of Your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact You to ask You for further information in relation to Your request to speed up Our response.

It is important that the Personal Information We hold about You is accurate and current. Please keep Us informed if Your Personal Information changes during Your relationship with Us.

#### **11. Security of Personal Information:**

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information. These include internal reviews of Our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where Your Personal Information may be accessed. We restrict access to Personal Information to Our employees, contractors, and agents who require or need to know that information in order to operate, develop, or improve Our Services. These individuals are contractually bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

We use standard, industry-wide, commercially reasonable security practices such as: (i) encryption, firewalls and SSL (Secure Socket Layers) for protecting Your Personal Information; (ii) ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services; (iii) ensuring We can restore access to Personal Information in a timely manner if a physical or technical incident occurs; and (iv) regular testing, assessment and evaluation of the effectiveness of Our technical and organizational measures to ensure Your Personal Information is secure. VA Tech *is also PCI-DSS and ISO 27001 certified.*

#### **12. Changes in Policy:**

This Policy replaces all previous disclosures We may have provided to You about Our information practice. We reserve the right to change this Policy, and any changes We may make to Our Policy in the future will be posted on this page. If there are material changes to this Policy, or Our information practices change in the future, We will notify You by posting the updated Policy on Our Website. Any updates to Our Policy will be effective upon posting.

#### **13. Contact Details:**

Questions, comments, and requests regarding this Policy are welcome and should be addressed to Our Grievance Officer, available at [privacy@vatechventures.com](mailto:privacy@vatechventures.com).

We pride ourselves on excellent customer service, but if You would like to make a complaint about the way in which We have collected or used Your Personal Information, please contact Us at [\*privacy@vatechventures.com\*](mailto:privacy@vatechventures.com).

**14. Version Control and review cycle:**

This is version 5.0 of VA Tech's Privacy Policy dated as of 15<sup>th</sup> March 2025. We will review this Policy, from time to time, as required under applicable law.