

Privacy Policy

This privacy policy governs your use of the Web Application, namely Vedra AI (hereinafter referred to as the “*Application*”) for Devices (*defined below*) that has been created by Hemraj Digital Minds LLP (hereinafter referred to as the “WEB APP”, “us”, “we”, “our” or “Company”, which also includes its affiliates, successors or assigns).

This Privacy Policy (“Privacy Policy”) explains how we collect, use, share, disclose and protect your Personal Information (as defined in the Terms of Use, which may be accessed via the following web link **<<TOU>>** (the “Terms of Use”). We created this Privacy Policy to demonstrate our commitment to the protection of your privacy, your Personal Information.

Any capitalized term used but not defined in this Privacy Policy shall have the meaning attributed to it in our Terms of Use. Additionally, ‘you’ and ‘your’ shall in addition to having the same definition in the Terms of Use, shall also collectively refer to Casual Users and End Users.

BY USING THE APP OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND AGREED TO BE BOUND BY THE PRIVACY POLICY. YOU HEREBY CONFIRM YOUR CONSENT TO OUR COLLECTION, USE, SHARING, AND DISCLOSURE OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

We reserve the right to change, modify, add or delete portions of the terms of this Privacy Policy, at our discretion at any time. If you do not agree with this Privacy Policy at any time, please do not use the App. If you create an Account in order to use the App on behalf of a third person or an Entity (such as your employer), you represent that you are authorized by such an individual or Entity to (1) accept this Privacy Policy on such individual’s or Entity’s behalf, and (2) consent on behalf of such individual or Entity to our collection, use and disclosure of such individual’s or Entity’s information to our collection, use, sharing and disclosure of such individual’s or entity’s information as described in this Privacy Policy.

I.Definition:

- a. **“Devices”** shall mean electronic devices which include but is not limited to personal computers, laptops, mobile phones or any other device(s) which allows a User to Interact with the Web App.

II.Nature of Information we collect:

- a. From the Casual Users we may collect:

- a) Personal Information;
- b) SPD;
- c) log information; and
- d) Device information.

- b. From End Users we may Collect from time to time

- a) Personal information;
- b) SPD
- c) Content;
- d) log information; and
- e) Device information.

III.Collection of Personal Information and SPD

- a. Collection of Personal Information and SPD: In order to effectively use the App, we may need to know your Personal Information and SPD such as passwords, etc. When you access the App, or communicate with us via emails, telephone calls or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you, or could be used to personally identify you. You hereby consent to the collection of such information by us. Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:
 - i. Your username, password and e-mail address when you create an Account on the App.
 - ii. Profile information that you provide for your user profile (e.g., first and last name, etc.). This information allows us to help you or others be "found" on the App.
 - iii. Content (e.g. Collateral, Digital Media, etc.).
 - iv. If you choose to find your friends through your device's contacts list, then the App will access your contacts list to determine whether or not someone associated with your contact is using the App.

- v. Other information that you voluntarily choose to provide to us (such as information shared by you with us through emails or letters, including Feedback).

IV. Other Information that we collect

- a. **Analytics Information:** We use third-party analytics tools to help us measure traffic and usage trends of our App. These tools collect information sent by your device or our App, and other information that assists us in improving your experience of the App. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User.
- b. **Cookies and similar technologies:** When you use the App, we may use cookies and similar technologies like pixels, web beacons, and local storage to collect information about how you use the App and accordingly provide different features to you. Additionally, we may ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by the third party or us.
- c. **Log File Information:** Log file information is automatically reported by your App each time you make a request to access (i.e., visit) the App. It can also be provided when you download the Enhanced Collateral or any other Content from the App to your device.
- d. **Device identifiers for your Mobile Device:** When you use a mobile device like a tablet or phone to access our Service, we may access, collect, monitor, store on your device, and/or remotely store one or more "device identifiers." Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by WEB APP. A device identifier may deliver information to us or to a third party partner about how you use the App and may help us or others provide reports or personalized content and ads. Some features of the App may not function properly if use or availability of device identifiers is impaired or disabled.

V. How we use your Information

- a. All the information provided on the App by you, including Personal Information, is voluntary. You understand that, we may use certain information of yours including but not limited to Personal Information or SPD
 - I. Help you efficiently access your information after you sign in to the App;

- II. remember information so you will not have to re-enter it during your visit or the next time you visit the App;
- III. for commercial purposes and in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes;
- IV. for sale or transfer of such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates; and
- V. Debugging customer support related issues. Additionally, we also reserve the right to use information provided by or about you for the following purposes: (a) to contact you for the purpose of offering any new service or obtain any feedback regarding the App; (b) analyzing software usage patterns for improving product design and utility; and (c) analyzing anonymous Content and information for commercial use.

VI. Statements of Privacy

- a. If you have voluntarily provided your Personal Information to us, for any of the purposes stated above, you hereby consent to such collection and use of such information by Web App. However, we shall not contact You on Your telephone number(s), if such telephone number is registered with the Do Not Call registry (“DNC Registry”) in India.
- b. Collection, use and disclosure of information, that has been designated as Personal Information requires your express consent. By affirming your assent to this Privacy Policy, you provide your consent to such use, collection and disclosure as required under applicable law.
- c. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of the Account creation process. If your Personal Information changes, you may correct, delete inaccuracies, or amend information by making the change on your Account or by contacting us through <<vedrasupport@hemrajgroup.co.in>> We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or we have reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, we may, at our sole discretion, discontinue your Account. There may be circumstances where we will not correct, delete or update your Personal Information, including (a) where the Personal Information is opinion data that is kept solely for evaluative purpose; and (b) the

Personal Information is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

- d. If you wish to cancel your Account on the App, contact us through

<<vedrasupport@hemrajgroup.co.in>> We will retain your information for as long as your Account is active and as needed to provide you the features of the App. We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. After a period of time, your data may be anonymous and aggregated and may be held by us, as long as necessary for us to improve the functioning of the App. However, Users should note that our use of the anonymous data would solely be for analytic purposes. Please note that your withdrawal of consent, or cancellation of Account may result in us terminating our relationship with you.

- e. If you wish to opt-out of receiving non-essential communications such as promotional and marketing-related information regarding our services that we may offer, please send us an email at **<<vedrasupport@hemrajgroup.co.in>>**. For any Interactions that require a payment of a service fee, we require you to pay with a credit card, wire transfer or debit card. We will collect such User's credit/debit card number and/or other financial institution information such as bank account numbers and will use that information for the billing and payment processes, including but not limited to, the use and disclosure of such credit/debit card number and other relevant information to third parties as necessary to complete billing operations. However, it is important for you to understand that, credit/debit card verification is completed only if you authenticate the verification process.
- f. When a User Interacts with the App, we may receive the Internet Protocol (IP) address of each User's device, the device operating system, and such other information. This information is used to analyze overall trends to help us improve your Interactions with the App. The linkage between your IP address and your personally identifiable information is not shared with or disclosed to third parties. Notwithstanding the above, we may share

and/or disclose some of the aggregate findings (not the specific data) in anonymized form (i.e., non-personally identifiable) with advertisers, sponsors, investors, strategic partners, and others in order to help grow its business.

- g. A User may have limited access to the App without creating an Account on the App. In order to have access to all the features and benefits on our App, a User must first create an Account on our App. To create an account, a User is required to provide the following information, which such User recognizes and expressly acknowledges is Personal Information allowing others, including us, to identify the User:
 - i. Name;
 - ii. User ID;
 - iii. email address;
 - iv. country, ZIP/postal code;
 - v. age;
 - vi. phone number; and
 - vii. password;
- h. This Privacy Policy applies to App only. We do not exercise control over the websites or information-display (e.g., as a link to another mobile application) displayed as part of providing our Services (e.g., in Digital Media, or Enhanced Collateral). These other websites or information-display may collect data or solicit Personal Information from the Users, for which, WEB APP shall not responsible or liable.
- i. WEB APP does not make any representations concerning the privacy practices or policies of such third party websites and/or information-display or terms of use of such websites and/or information-display, nor does WEB APP guarantee the accuracy, integrity, or quality of the information, data, text, images, software, sound, photographs, graphics, videos, messages or other materials available on such websites and/or information-display. The inclusion of any links on our App, does not imply any endorsement by us of such third party websites and/or information-display, the website and/or information-display's provider, or the information on the website and/or information-display. If you decide to visit a third party website and/or information-display linked on our App or from material produced from our App (e.g., Enhanced Collateral), you do this entirely at your own risk. WEB APP encourages the User to read the privacy policies of that website and/or information-display.
- j. The Web App may enable Users to communicate with other Users or to post information to be accessed by others, whereupon other Users may collect such data. Such Users, including any moderators or administrators, are not our authorized representatives or agents, and their opinion or statements do not necessarily reflect those of WEB APP, and they are not authorized to bind WEB APP to any contract. WEB APP hereby expressly

disclaims any liability for any reliance or misuse of such information that is made available by Users or visitors in such a manner.

- k. WEB APP does not collect information about the visitors of the Web App from other sources, such as public records or bodies, or private organizations, save and except for the purposes of registration of the Users (*the collection, use, storage and disclosure of which each User must agree to under the Terms of Use in order for the Company to effectively render the Services*).
- l. We maintain a strict "No-Spam" policy, which means that we do not intend to sell, rent or otherwise give your e-mail address to a third party without your consent.
- m. WEB APP has implemented best international market practices and security policies, rules and technical measures to protect the personal data (including Personal Information and SPDI) that it has under its control from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorized access to the User's electronic devices through which the User uses the App, WEB APP shall not be held liable for any loss whatsoever incurred by the User.
- n. WEB APP implements reasonable security practices and procedures and has a comprehensive documented information security program and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of the Company's business.
- o. WEB APP takes your right to privacy very seriously and other than as specifically stated in this Privacy Policy, we will only disclose your Personal Information in the event it is required to do so by law, rule, regulation, law enforcement agency, governmental official, legal authority or similar requirements or when WEB APP, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms of Use.

VII. CONFIDENTIALITY AND SECURITY:

- a. Your Personal Information is maintained by WEB APP in an electronic form on its equipment, and on the equipment of its employees. Such information may also be converted to physical form from time to time. WEB APP takes all necessary precautions to protect your Personal Information both online and off-line, and implements reasonable security practices and measures including certain managerial, technical, operational and physical security control measures that are commensurate

with respect to the information being collected and the nature of our business.

- b. No administrator at WEB APP shall have knowledge of your password. It is important for you to protect against unauthorized access to your password, your computer and your mobile phone and any such device. Be sure to log off from the App when finished. WEB APP does not undertake any liability for any unauthorized use of your Account and password. If you suspect any unauthorized use of your account, you must immediately notify WEB APP by sending an email to <<vedrasupport@hemrajgroup.co.in>>. You shall be liable to indemnify WEB APP due to any loss suffered by it, due to such unauthorized use of your Account and password.
- c. WEB APP makes all User information accessible to its employees, agents or partners and third parties only on a need-to-know basis, and binds its employees to strict confidentiality obligations.
- d. Notwithstanding the above, WEB APP shall not be responsible for the confidentiality, security or distribution of your Personal Information by our partners and third parties outside the scope of our agreement with such partners and third parties.
- e. Further, WEB APP shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond our control; including but not limited to, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the User etc.

VIII.CHANGE TO PRIVACY POLICY:

1. We may update this Privacy Policy at any time, with or without advance notice. In the event there are significant changes in the way we treat User's personally identifiable information, or in the Privacy Policy itself, we shall display a notice on the App or prompt users to accept the updated Privacy Policy on the User's next login to the App or send Users an email, as provided for above, so that you may review the changed terms prior to continuing to use the App. As always, if you object to any of the changes to our terms, and you no longer wish to use the App, you may contact <<vedrasupport@hemrajgroup.co.in>> to deactivate your account or simply deactivate your Account from within the App. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your Account.

If a User uses the App after a notice of changes has been sent to such User, such User hereby provides his/her consent to the changed terms.

IX. CHILDREN'S AND MINOR'S PRIVACY:

We strongly encourage parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. Although, our App is not intended for use by minors, we respect the privacy of minors who may inadvertently use the Internet.

X. CONSENT TO THIS POLICY:

You acknowledge that this Privacy Policy is a part of the Terms of Use of the App, and you unconditionally agree that becoming a User of the App and its signifies your assent to this Privacy Policy. Your use of the App is subject to this Privacy Policy, the Terms of Use and EULA.