PRIVACY POLICY

This Privacy Policy ("**Privacy Policy**") describes the use and processing of information by Avalon Labs Private Limited, a company incorporated under the laws of India with company registration number U74999DL2021PTC377528 ("**Company**"). The Company is committed to protecting the User Information (*defined hereinafter*) and privacy. This Privacy Policy applies to information the Company collects when the User (*as defined in the Terms*) uses the Services and other services that links to this Privacy Policy. The Company is committed to ensuring that any use or sharing of User Information with anyone shall be done only in accordance with the procedures described in this Privacy Policy.

This Privacy Policy is designed to help the User understand how the Company may collect, process, store and use the information provided by the User to the Company and to assist the User in making informed decisions while using the Services.

The capitalized terms used in this Privacy Policy, but not defined in this Privacy Policy, shall have the meaning given to such terms in the Terms (*defined hereinafter*).

Please read this Privacy Policy carefully before using the Services or submitting any personal information. By accessing or using the Website, Platforms, Services, or by providing any User Information (including information related to other persons), such person consents to the collection, use, sharing, and disclosure of the information disclosed during the use of the Services, in accordance with this Privacy Policy. This includes, but is not limited to, the User's consent for the collection, use, sharing, and disclosure of their information as outlined in this Privacy Policy.

This Privacy Policy has been published *inter alia* in compliance with the provisions of: (a) the Information Technology Act, 2000, and the rules and regulations made thereunder including, but not limited to the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011; and (b) Digital Personal Data Protection Act, 2023 ("**DPDP Act**") and its rules, as applicable.

Please also note that the Privacy Policy will also apply to information of Users supplied by other Users. In case of User Information supplied by other Users, the User providing the information confirms and warrants that the User has the authority to provide the necessary User Information.

1. **Other applicable terms**

   This Privacy Policy is a part of and incorporated within, and is to be read along with, the terms and conditions published on the Website and associated platforms of the Company (the "**Terms**").

2. **Policy changes**

   The Company may change and update this Privacy Policy from time to time. Such changes may be made without prior notice, but any changes will only apply to activities and information on a going-forward basis and not on a retroactive basis, unless specified otherwise. The Users are encouraged to review this Privacy Policy before accessing the Services to make sure that the Users understand how any personal information provided by the User will be used.

3. **Links to Third-Party Websites**

   The procedures and practices set forth in this Privacy Policy describe the use and disclosure of User Information collected by the Company. The Website and Platforms of the Company, as available, may contain links to other websites. Any personal information about the User collected when such User visits such websites is not governed by this Privacy Policy. The User

is encouraged to exercise caution and review the privacy policies applicable to such websites before accessing them. The User acknowledges that the Company shall not be responsible for and has no control over the practices and content of any website accessed using the links contained on the Website and Platforms.

4. **Collection of information**

The Company collects two basic types of information from a User in conjunction with a User's use of the Services i.e. personal information, which is any information that exclusively identifies a User (e.g., the User's name, email address, telephone number, postal address amongst others) and non-personal information, which is information that does not exclusively identify a User but is related to the User nonetheless such as information about a User's interests, demographics and use of the sites. The Company may also receive personal information regarding a User as shared by third parties who may be the clients or otherwise avail services from the Company. Please note that in such instances, the Company is acting on the instructions provided by such client or user and the Company does not separately verify the right of the client or user to provide User Information to the Company. In case the User is not the intended recipient of the services and associated platform, the User should contact the Company at the earliest.

Towards the provision of the use of the Services, the Company shall, in addition to the information described above, collect the following information from a User ("**User Information**"):

Location	Information about the location of the User and the type of device used to access the Services. This is used for the provision of the Services, pricing-related information, maintenance of records for audit purposes and other matters.
Details of the devices used	IP address of such devices, unique ID of the device/ unique device identifier, browser type and version, pages visited by the User on the browser, including visit time and duration, and mobile operating system.
Access information	Passwords and other details required to access or use the Services.
Personal information	Information about the name, email address, contact information and details of official documents. This is used for the provision of the Services and for the maintenance of records for audit purposes.
Other applications	The User's use of other software or applications which are linked or used in the provision of the Services, e.g. any third-party sites through which a User may have accessed the Services.
Transaction information	Transaction-related information for transactions conducted by the Users on the Website or Platforms or with the Company. Transaction information includes price, quantity, and any associated or supporting data related to a transaction. Transaction information is used to provide the services, facilitate the transactions, provide support, and operate, maintain and improve the services.
Partner information	On the use of the Services of the Company by an affiliate / partner of a registered User, the name, email, contact, details, access, and use of documents by the affiliate / partner of a registered User.
Billing Information	To the extent permitted and required under Applicable Laws, billing and payment information of Users, which may include a subscription number, an account number, credit card number,

	expiration date, billing pin code, exchange market information, and instructions for wire transfers.
Automated collection	Details of the User's device, computer, and activity on the Website and Platform, along with other similar information such as diagnostics data. The Company collects this information for analytics, service improvement, and review purposes.
Others	As may be explicitly required & requested from time to time.

5. **Processing of User Information**

User Information will be collected, processed, and disclosed by the Company for limited purposes, which the Company considers necessary for achieving a seamless, efficient, and safe experience, customised to a User's needs. The Company may use the personal information to provide services to a User, enhance the operation of the Services, and improve the Company's marketing and promotional efforts, and shall always comply with the DPDP Act (as and when notified by the Government of India). The processing of the User's Information is for the purposes of:

(a) to provide, maintain and enhance the User experience in relation to the Services;

(b) manage the User's account and registration process;

(c) to provide and deliver the services requested by the User;

(d) to authenticate the User's documents and information and to comply with Applicable Laws;

(e) to send technical notices, updates, security alerts, support and administrative messages to the User;

(f) to take up and investigate any complaints / claims / disputes of the User;

(g) to respond to queries or feedback submitted by the User;

(h) to monitor and analyze trends, usage, and activities in connection with the Services;

(i) to link or combine with information the Company receives from others to understand the User's needs and provide better Services;

(j) to inform the Users of online and offline offers, products, services, and updates on the Website and Platforms;

(k) to detect and protect the Website Platforms against error, fraud and other criminal activity;

(l) to comply with the Applicable Laws and regulations of this Privacy Policy;

(m) to carry out any other purpose for which the information was collected; and

(n) to share the data, such as back testing, user action and processed data for internal and external services with third parties without the User's consent.

By continuing to use the Website, Platform and Services of the Company, the User consents to the processing of the User Information as outlined in this Privacy Policy. Where permitted by Applicable Law, the Company may also process User Information without explicit consent.

6. **Information collected by Cookies and other tracking technologies**

(a) The Company shall use various technologies to collect information, including cookies and web beacons. Cookies are small data files typically stored on the User's computer's hard drive or in device memory that help the Company to improve Website, Platforms and User's experience, see which areas and features of the Website and Platforms are popular and count visits, manage the registration process for accounts, remember User's site preferences, and retain information to provide User with support.

(b) The Company also use cookies stored in emails to help confirm the User's receipt of, and response to such emails. Web beacons are electronic images that may be used in services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

(c) Information collected from cookies is used by the Company to evaluate the effectiveness of the Website, Platforms, analyse trends, identify difficulties visitors may experience in accessing the Website and associated platforms, and administer the Website, Platforms and Services.

7. **Storage of User Information**

(a) User Information in the possession and control of the Company is stored in accordance with the Applicable Laws. Storage and transfer of User Information is carried out in compliance with all Applicable Laws, including without limitation, the Information Technology Act, 2000, the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 and the DPDP Act, as applicable. Please note that the Website and Platforms have reasonable security measures, including as mentioned in the Information Technology Act, 2000, in place to protect against the loss or misuse of the User Information. Whenever a User changes or accesses the User's account information, the Company offers the use of a secure server. However, the User acknowledges that transacting over the internet has inherent risks which can only be avoided by the User following reasonable security practices, such as not revealing account / login related information to any other person and informing the Company's customer care team about any suspicious activity or where the User's account has / may have been compromised.

(b) The Company implements reasonable security practices and procedures and has a comprehensive documented information security programme 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. The Company has put in place appropriate physical, electronic and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the User Information the Company collects online.

(c) Please note that the Company does not guarantee that there will be no unintended disclosures of the User Information provided by a User on account of a data breach, unauthorized access, security failure, etc. The Company cannot guarantee, gives no warranties, and shall not be liable for breaches of the security of User Information through the Services due to malicious attacks, errors, commissions, or omissions not wilfully initiated by the Company, and any transmission is at the risk of the User.

(d) As part of the business functionality of the Company, the Company may retain and submit certain User Information to third parties as required, as well as to appropriate legal and regulatory authorities (when requested to do so).

(e) The Company may also disclose 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 the Company, 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 this Privacy Policy.

(f) Each User accepts and acknowledges that any User Information available with the Company may also be used by the Company: (a) for the purpose of providing the services; (b) in an aggregated or non-personally identifiable form for the purpose of research and analysis and for transfer of such research and analysis; (c) for communication purpose; (d) debugging customer support related issues; and / or (e) in anonymized form (i.e., non-personally identifiable) in order to help grow the business of the Company. Each User hereby consents to such collection, use and disclosure.

(g) Additionally, User Information may be shared by the Company with a third party in case of any proposed merger, acquisition or re-organization, amalgamation, or restructuring of business.

(h) **Data transfers to other countries:** The Company may transfer User Information to countries other than the country in which such User Information originally was collected, except the restricted countries as may be notified by the central government of India from time to time. Those countries may not have the same data protection laws as the country in which the User has initially provided the information. When the Company transfers User Information to such other countries, the Company will protect such User Information as described in this Privacy Policy.

8. **Dissemination of User Information**

Where any service requested by a User involves a third party, such information as is reasonably necessary by the Company to carry out the User's service request may be shared with such third party, and the Company may also obtain details and information from the third party on usage. The Company may also engage with other companies / persons to complete services, process payments, and provide customer service. The Users understand that they have access to personal information needed to perform their functions.

Additionally, User Information may be shared by the Company with a third-party business entity in case of any proposed merger, acquisition or re-organization, amalgamation, or restructuring of business.

The Company may be required to disclose any information that is lawfully sought from it by a judicial or other competent body pursuant to Applicable Laws.

The Company may anonymize and /or de-identify information collected from the Users. The Company's use and disclosure of aggregated and / or de-identified information is not restricted by this Privacy Policy, and it may be used and disclosed to others without limitation.

9. **Retention of User Information**

The Company shall retain the personal information of the User as long as it serves the purpose(s) for which it was initially collected, as stated in the Privacy Policy or subsequently

authorized. The Company may continue processing the User's personal information for a period beyond such period only for the time and to the extent such processing reasonably serves the purposes of archiving, and subject to the protection of this Privacy Policy and to comply with requirements under Applicable Laws. After the expiry of this time period, the Company may either delete the User's personal information or retain it in a form such that it does not identify the User personally.

10. **Communication policy**

When the User sets up an account or receives any request pursuant to the provision of the services of the Company, the User is deemed to have opted in to receive emails and messages from the Company and its service providers in connection with the provision of the services of the Company as well as any marketing and promotional agencies. While the User may opt out of promotional messages, the User cannot opt out of receiving certain administrative, financial, technical and legal information from the Company in connection with the services of the Company.

11. **Alteration of User Information**

In case the User requests any change or deletion of User Information of the User, or permanently deletes the User Information, the User must contact the Company at support@acadally.com or contact the Data Protection and Grievance Officer. Do note that the Company is not obligated to alter, vary or delete any User Information which it is required to maintain under Applicable Laws or pursuant to contractual requirements of the Company.

12. **Data breach and disclosure notification**

In case of a data breach or an unauthorized disclosure of User Information which is likely to result in a high risk to the rights and freedoms of the User, unless the Company has appropriately mitigated the risk arising from such incident, the Company shall, within 2 (two) days notify the affected Users of such breach with the details of the breach or incident, the consequences of such breach and the contact personnel of the Company in case of any queries by the User pertaining to such breach.

In case any governmental or regulatory authority requires the Company to provide any User Information, unless specifically directed otherwise by the governmental or regulatory authority, the Company shall disclose to the User the details of the request for the User Information.

13. **Rights of the User**

User's rights regarding the processing of the User's personal data are important to the Company, and the Users can exercise these rights at any point. The company has provided an overview of these rights below, together with what this entails for the User. Users can exercise their rights by sending an email to the Company.

User has certain rights with respect to personal data belonging to such User collected by the Company for the purposes mentioned in this Privacy Policy. The rights are available as per the DPDP Act (as and when notified by the Government of India) and/ or other Applicable Laws:

(a) Right to access information

The User has the right to request for:

(i) a summary of personal data which is being processed and the processing activities undertaken with respect to such personal data;

(ii) the identities of all other data fiduciaries and data processors with whom the personal data has been shared by the Company, along with a description of the personal data so shared;

(iii) any other information related to the personal data and its processing, as may be prescribed.

(b) Right to correction and erasure

The User has the right to request the Company to:

(i) correct the inaccurate or misleading personal data;

(ii) complete the incomplete personal data;

(iii) update personal data; and

(iv) erasure of personal data

(c) Right to nominate

The User has the right to nominate a representative who will act on behalf of the User to exercise the rights of the User in case of incapacity, death, etc.

(d) Right to withdraw consent

The User has the right to withdraw consent for any purpose for which the User has earlier consented to.

14. **Termination of access**

Notwithstanding anything to the contrary:

(a) where any User commits a breach of / fails to comply with any of the provisions of this Privacy Policy;

(b) where any User fails to comply with Applicable Law;

(c) where any User uploads or provides information or data to the Company, which is not compliant with or violates any Applicable Law or the Privacy Policy;

(d) where the User commits a breach of the intellectual property rights of the Company and / or any third person;

(e) where the Company ceases to carry on its business or the Services are taken offline;

(f) where the Company has reasonable grounds for suspecting any illegal, fraudulent, unethical or abusive activity by such User;

(g) where the Company is investigating any complaints or alleged violations by such User of the Privacy Policy, Applicable Law or for any other reason;

(h) where the Company believes, in its sole discretion, that the User's actions are causing or may cause legal liability for other Users and / or the Company, or are contrary to the

interests of the Company, the Website and Platforms, the intellectual property rights of the Company or third parties, the Privacy Policy, and / or the User Information;

the Company shall have the right to immediately: (a) terminate the right to access / usage of such User to the services of the Company, Website and associated platforms; (b) de-activate the account of such defaulting User (if any); (c) investigate and take appropriate action against a User for any such alleged breach; (d) file a complaint with or report any illegal activity to the appropriate governmental / regulatory bodies or law enforcement agencies; and / or (e) take any other action deemed appropriate, under Applicable Law.

15. **Governing law and disputes**

The laws of India shall govern this Privacy Policy. Any dispute arising out of or in connection with the Privacy Policy, including any question regarding its existence, validity or termination, and any dispute relating to any obligations arising out of or in connection with the Privacy Policy shall be subject to the exclusive jurisdiction of the courts at New Delhi, India.

16. **Grievance Redressal**

In case a User has any queries or any discrepancies / grievances with respect to the User Information provided by the User or has to exercise its rights as mentioned in paragraph 14 above, the User may contact the Company's Data Protection and Grievance Officer by writing to:

Name:	Yash Prakash
Email:	info@acadally.com
Address:	Nagpal Tower, Pocket D, Okhla Phase II, Okhla Industrial Estate, New Delhi, Delhi: 110020

If the User is not satisfied with how their request has been handled by the Company, they may approach the relevant Data Protection Board constituted under the DPDP Act (as and when notified by the Government of India).

17. **Updates to the Privacy Policy**

The Company reserves the right, at any time, to add to, change, update, or modify this Privacy Policy. The latest Privacy Policy will be available on this page.